



The Planning  
Inspectorate

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# Report to Waltham Forest Council

by **P W Clark MA MRTPI MCI**

an Inspector appointed by the Secretary of State for Communities and Local Government

Date: 1<sup>st</sup> December 2011

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PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

**REPORT ON THE EXAMINATION INTO THE WALTHAM FOREST LOCAL  
DEVELOPMENT FRAMEWORK CORE STRATEGY**

**DEVELOPMENT PLAN DOCUMENT**

Document submitted for examination on 31 May 2011

Examination hearings held between 26 September and 3 October 2011

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## Abbreviations Used in this Report

AA	Appropriate Assessment
AAP	Area Action Plan
BEA	Borough Employment Area
BREEAM	Building Research Establishment's Environmental Assessment Method
CABE	Commission for Architecture and the Built Environment
CfSH	Code for Sustainable Homes
CO2	Carbon Dioxide
CS	Core Strategy
DPD	Development Plan Document
ELSHMA	East London Strategic Housing Market Assessment
EH	English Heritage
GLA	Greater London Authority
L&Q	London and Quadrant Housing Trust
LB	London Borough
LBWF	London Borough of Waltham Forest
LVRPA	Lee Valley Regional Park Authority
LDS	Local Development Scheme
MPG	Minerals Planning Guidance
MOL	Metropolitan Open Land
NHS	National Health Service
NOFAAP	North Olympic Fringe Area Action Plan
PPG	Planning Policy Guidance
PPS	Planning Policy Statement
RS	Regional Strategy
SA	Sustainability Appraisal
SANGS	Suitable Alternative Natural Green Space
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SHLAA	Strategic Housing Land Availability Assessment
SMEs	Small and Medium Enterprises
SPA	Special Protection Area
UDP	Unitary Development Plan

## **Non-Technical Summary**

This report concludes that the Waltham Forest Council Local Development Framework Core Strategy Development Plan Document provides an appropriate basis for the planning of the London Borough of Waltham Forest over the next 15 years. The Council has sufficient evidence to support the strategy and can show that it has a reasonable chance of being delivered.

A number of changes are needed to meet legal and statutory requirements. These can be summarised as follows:

- Revised policies concerning public houses, the night time economy, tall buildings, affordable housing, flood risk, transport and heritage planning;
- Inclusion of policies on minerals, gypsies and travellers, energy saving, residential amenity, noise and air pollution;
- Incorporation of the Lee Valley Regional Park Plan and its successor;
- Clarification of the relationship between the Core Strategy and other Development Plan Documents;
- Improvements to the delivery mechanisms and monitoring framework;
- Identification of policy contained in supporting text; and
- Clarification of uncertain meanings.

All of the changes recommended in this report are based on proposals put forward by the Council in response to points raised and suggestions discussed during the public examination. The changes do not alter the thrust of the Council's overall strategy.

## Introduction

1. This report contains an assessment of the Waltham Forest Local Development Framework Core Strategy Development Plan Document (DPD) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004. It considers whether the DPD is compliant in legal terms and whether it is sound. Planning Policy Statement (PPS) 12 (paragraphs 4.51-4.52) makes clear that to be sound, a DPD should be justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for the examination is the Proposed Submission Draft Core Strategy published for consultation in January 2011 together with a Schedule of Post Publication Minor Changes of May 2011 which were both submitted on 31 May 2011.
3. The report deals with the changes that are needed to make the DPD sound. They are identified in **bold** in the report. Some changes are required to respond to more than one issue of soundness and so references to them appear more than once in this report. All of these changes have been proposed by the Council, in some cases at my suggestion, and are presented in Appendix A. The change proposed to policy CS15(C) is a conflation of several amendments proposed at different stages of the examination.
4. For convenience of use, the appendix includes the post publication minor changes (unless superseded) and both minor changes and changes required for soundness and so is a comprehensive list of all the changes to be made to the Proposed Submission document. The changes are marked S (for Soundness) or M (for Minor). Those marked S are the changes which are essential for soundness.
5. None of these changes alter the thrust of the Council's overall strategy. Few materially alter the substance of the plan and its policies; those that do draw upon material and evidence previously consulted upon and forming part of previous sustainability appraisals and so do not undermine the sustainability appraisal and participatory processes undertaken.
6. Some of the changes put forward by the Council are factual updates, corrections of minor errors or other minor amendments in the interests of clarity. As these changes do not relate to soundness they are generally not referred to in this report although it endorses the Council's view that they improve the plan. These are shown in Appendix A marked M. The Council is free to update references, make any additional minor changes to page, figure, paragraph numbering and to correct any spelling errors prior to adoption.

## Assessment of Soundness

### Main Issues

7. The Core Strategy is a document containing a spatial vision, and sixteen strategic objectives each with a corresponding policy, all demonstrably derived from the Borough's Sustainable Community Strategy. Policies are subdivided into a number of sections making a total of 123 policy points. Appendices provide an infrastructure delivery plan, monitoring indicators and targets.

8. It is supported by ninety-nine documents providing key evidence. These include substantial analyses, many carried out by consultants, of aspects of the borough such as its character, carbon footprint, crime, health, land availability, housing market, affordable housing viability, infrastructure needs, economy, commercial retailing and leisure activity, open space, playing pitches, trees, flood risk and air quality.
9. The soundness of a plan can be judged by certain tests. These include tests of justification, compliance with national policy and effectiveness.
10. An initial appraisal of the Core Strategy did not reveal any obvious lack of justification other than that identified as issue 10. Participants in the process raised other issues of justification (Issues 9 and 11 to 19). As these included participants with a right to be heard, this report includes their consideration. Although that consideration has led the Council to put forward some changes to the plan to render it sound, in general terms the examination has found the Core Strategy to be well-justified.
11. A check made against national policy reveals no positive contradictions of substance but a few omissions of subject matter which national policy requires for a plan to be effective (issue 6). However, there is extensive departure from national policy concerned with techniques to make the Core Strategy effective (e.g. paragraphs 53 to 55, 61 and 62 of PPS3, paragraphs EC3.1(g), EC4.1(d), EC5.1, EC5.2 and EC5.5 of PPS4, paragraph 5(ii) of PPS9, paragraphs 4.1(2), 4.1(3), 4.7, 4.30 and 5.2(4) of PPS12, paragraphs 6(7), 31(1), 50, 51, 75 and 78 of PPG13, paragraphs 1(iii) and 6 of PPS22 and paragraphs 9 and 12 of PPS25).
12. In addition to doubts about the effectiveness of the Core Strategy revealed by a check of compliance with government policy, examination of the Core Strategy itself reinforced those doubts. Examination of the Strategy's effectiveness has led to the majority of changes needed to secure its soundness.
13. Taking account of the tests carried out together with all the representations, written evidence and the discussions that took place at the examination hearings there are nineteen main issues upon which the soundness of the plan depends. They fall into two groups; issues concerned with points of justification; and issues concerned with effectiveness.

### **Effectiveness issues**

#### **Issue 1 – Delivery mechanisms**

*What, where, when and by whom*

14. As submitted, the Core Strategy gave rise to concerns about the adequacy of the Infrastructure Delivery Plan (Appendix 1) in meeting the requirements of PPS12, paragraph 4.1(2) for a delivery strategy, setting out (a) how much development is intended (b) where, (c) when and (d), by whom. There are similar issues in respect of policies CS2, table 4, CS4, CS13, CS14 and their compliance with similar requirements in PPSs 3 and 4 and PPG8.
15. The Council responds by proposing **(191)** an extensive addition to Chapter 20

of the plan including a table setting out the quantities of housing, retail and employment development which is expected to be delivered. It points me to an evidence document (the Waltham Forest Retail and Leisure Study) justifying a zero target for major commercial leisure facilities. The council also proposes a revised table 4 in chapter 5 **(41)**, a new Implementation and Delivery Appendix **(194)**, a revised Infrastructure Delivery Appendix (formerly appendix 1) **(195)**, and a rewritten Monitoring Indicators and Targets Appendix (formerly Appendix 2) **(196)**.

16. In combination, these amendments to the Core Strategy would provide an effective Infrastructure Delivery Plan. They are necessary to the soundness of the Core Strategy.

*The Infrastructure Delivery Plan (Core Strategy Appendix 1)*

17. As submitted, the Core Strategy gave rise to doubts about the relationship and consistency between references to proposals in policies and Appendix 1. The Council proposes a number of revisions to Appendix 1 **(195)** or to supporting text within the policies of the plan **(68, 101, 102, 116, 140, 148, 207)**, which would demonstrate a consistent relationship between policies and infrastructure proposals in Appendix 1. These changes are necessary for the soundness of the Core Strategy.
18. Thames Water suggests an addition to Policy CS1 (F), CS3 or CS5 to support improvements to Deephams Sewage Treatment Works and add a related entry to the Sewerage section of Appendix 1 (Infrastructure Delivery Plan). Whilst the Council fully supports the proposed improvements to the Deephams Sewage Treatment Works, it is not considered appropriate to include a statement of support as Core Strategy Policy.
19. That makes sense because the site in question is outside the borough and so could not be bound by any policy within the LBWF CS. Nevertheless reference in appendix 1 would be appropriate as it appears that this infrastructure provision would be a necessary precondition to achieving the quantities of development proposed in the Core Strategy. It is clear that the extent of development proposed within Waltham Forest would be dependent on the provision of the works proposed by Thames Water at Deephams Sewage Treatment Works and so the Core Strategy would not be sound without an acknowledgement of that fact in the Infrastructure Plan (CS Appendix 1), an amendment **(195)** which the Council now proposes.

*Changes to the Proposals Map (Core Strategy Appendix 5)*

20. The submitted Core Strategy gave rise to issues about the relationship and consistency between references to proposals in policies and in Appendix 1 and proposals to change the proposals map in Appendix 5. The Council points me to an evidence document to explain the omission of reference to strategic flood defence infrastructure. The Council proposes some additions to Appendix 5 **(205, 206, 207)** in response to the issues raised but, consistent with its concept of the Core Strategy as an overarching policy document to be fleshed out by other DPDs, the Council mostly responds that precise designations of sites and their consequent inclusion on the proposals map must await the adoption of those later DPDs.

21. Nevertheless it proposes amendments to policies **(91, 93)**, supporting text **(101, 102, 103, 116, 148, 173)**, and Appendices 1, 2 and 5 **(195, 196, 207)** which would provide much greater certainty as to the areas and locations envisaged for proposals coming forward. It also provides a map showing the Site Opportunity Locations currently being considered in the emerging AAPs and Site Specific Allocations DPD **(20)**. These amendments would provide an acceptable substitute for an amendment to the proposals map in providing for certainty and are all necessary for soundness.

### **Issue 2 – Monitoring framework**

22. In response to a request for evidence linking the achievement of quantities of growth to the achievement of infrastructure items, the Council has referred me to document KE56 (the Waltham Forest Infrastructure Plan: Social Infrastructure Needs Assessment) and proposes an amendment **(69)** to paragraph 7.24 to make a connection to the Infrastructure Delivery Plan at Appendix 1. These responses demonstrate that this aspect of the Core Strategy would be soundly based.
23. In response to a request for clarification of the relationships between the outcomes, targets and indicators of appendix 2 and the provisions of their respective policies the Council proposes a rewrite of Appendix 2 and amendments to table 4 of chapter 5. These amendments **(40, 41, 196)** would establish a clear audit trail between policies, outcomes, indicators and targets and so are necessary for the soundness of the Core Strategy.

### **Issue 3 – Relationship between Core Strategy and other DPDs**

24. There are five aspects to this issue. They are;
- (i) Treatment of key sites/LVRP
  - (ii) Area Action Plans DPDs
  - (iii) Development Management Policies DPD
  - (iv) Site allocation DPD
  - (v) Waste Planning DPD

#### *Key sites and Lee Valley Regional Park Plan*

25. As submitted the Core Strategy delegated site identification and much policy substance to other DPDs without specified outcomes, targets or criteria by which those other DPDs could be judged. The Council's conception of the Core Strategy is as an overarching, direction-setting document, to be fleshed out by subsequent DPDs. Those who later have to consider the soundness of subsequent DPDs will have to consider the extent to which they conform with, and achieve the aims of the Core Strategy.
26. Amendments proposed by the Council will rename key sites as site opportunity locations. A map of these will be included within the Core Strategy. Subsequent DPDs will select which of these sites will be taken forward as development proposals. In conjunction with the descriptive material contained from paragraphs 4.9 onwards, which the Council proposes to update, this amendment **(20)** would be sufficient to establish an audit trail of effectiveness for the subsequent examination of the subsidiary DPDs and so would be essential for soundness.

27. There are specific concerns about the way in which the Core Strategy complies with the legal requirement to include the provisions of the Lee Valley Regional Park Plan within the Council's Development Plan Documents. To some extent, these issues are considered as part of the discussions on issue 12. Following that Hearing session, the Council proposes an addition to paragraph 9.15 of the Core Strategy to make it clear how the Lee Valley Park Development Framework will be incorporated into the Local Development Framework. This change **(110)** is necessary for the plan to comply with legal requirements and so be sound.

#### *Area Action Plan DPDs*

28. There are concerns with the terminology used in paragraphs 4.27-4.29 of the CS. The Council proposes a change to paragraph 4.27 and the Key diagram to clarify the terminology used **(29, 35)**. These changes are necessary for soundness.
29. There are issues raised by participants concerning the accuracy of the depiction of the North Olympic Fringe Area Action Plan (NOFAAP) on the Key diagram. These concerns are met by a proposed change to the Core Strategy **(35)** which is necessary for accuracy and therefore, soundness.
30. A participant considers the delineation of the southern part of the NOFAAP to be arbitrary. It is also concerned that the site of the Cathall Road Substation within NOFAAP is blighted by the currently safeguarding for the Crossrail 2 Extension.
31. Safeguarding for Crossrail 2 is a matter of government and GLA direction. It would be unsound for the Core Strategy to propose any change to the proposals map not in compliance with such direction. The proposed amendment **(20)** to include a map of site opportunity locations within the Core Strategy shows the Cathall Road Substation Site as such an opportunity site. As noted above, it would be for subsequent DPDs to select from that map sites to be included as specific proposals. The Core Strategy would be sound without further change.
32. The changes to the extent of the NOFAAP put forward by the participant would include one additional site opportunity location within the AAP boundary but exclude two others in a cluster nearby. This cluster would be separated from the existing boundary of the AAP by an extensive area of housing and cemetery land where development and regeneration opportunities would be sparse.
33. This would contrast with their relative concentration and intensity within the existing boundary. The Local Development Scheme points out that Area Action Plans will have a geographic dimension focussed on smaller areas of the borough setting out areas in which change is expected. Although the additional area sought by the participant clearly has a high level of deprivation as evidenced by the data put forward, it is the potential and expectation of change which is the criterion for inclusion within the AAP and so the Core Strategy would be sound without the change sought.

### *Development Management Policies (DMP) DPD*

34. Policy CS14(E) seeks to create a sustainable pattern of town centre uses by consolidating retail activities within compact retail core areas. Definition of the extent of each centre and the extent of primary and secondary frontages within each would be left to the forthcoming Development Management Policies DPD without criteria for it to follow. In response to this concern, the Council proposes to include an additional paragraph to follow 17.14 of the Core Strategy setting criteria for the definition of primary and secondary frontages. This change (**173**) is essential for the soundness of the Core Strategy (see issue 9 below).
35. Concerns about the relationship between policy CS4(A), paragraph 7.20 and the DMP DPD in relation to public houses has led to the Council proposing an amendment (**63**) which would resolve this relationship (see issue 10 below).
36. Concerns about the relationship between core strategy policies and the reference to the Development Management Policies DPD in the post-publication change to paragraph 14.12 have led to the Council proposing an amendment to the plan (**107**) which resolves the relationship.
37. At an earlier stage of preparing the Core Strategy, LB Hackney's concerns led to the Council including table 6 and maps to make it clear, in advance of the Development Management Policies DPD, what employment land will be retained. These make clear the primacy of the Core Strategy
38. In response to concerns about the relationship between paragraphs 11.35, 11.36, policy CS8(I) and the Development Management DPD the Council proposes three amendments (**126, 135, 136**) so as to clarify the objectives of policy, the criteria for its application in the DM DPD and to eliminate some confusion between justification and explanation. These changes make clear the primacy of the Core Strategy and so are necessary for its soundness.

### *Site Allocations DPD*

39. One representation sought a specific change to the Core Strategy to give authority to determine applications in accordance with master plans in advance of the preparation of the Site Allocations DPD. The Council's response; that, in advance of the preparation of the Site Allocations DPD, applications will be determined by reference to the Unitary Development Plan and other material considerations is the correct one. No change to the Core Strategy is required for soundness.
40. As submitted, the Core Strategy gave rise to concern with the delegation of sites and locations selection to the Site Allocations DPD without limitation or criteria and the omission of identifiable locations from the Infrastructure Delivery Plan (Appendix 1 of the Core Strategy as submitted). As noted previously, the Council proposes an amendment (**20**) to include a map within the Core Strategy from which site selections would be made. It also proposes an amendment (**180**) to set criteria for site selection for tall buildings. There are also amendments (**195**) to Core Strategy Appendix 1 to identify locations for proposals where previously missing or unidentified. These amendments are all necessary for the soundness of the Core Strategy.

### *North London Waste Plan*

41. The Council is participating in the preparation of a joint North London Waste Plan. In that light, it might be thought to be an unnecessary and therefore unsound duplication that the Core Strategy contains chapter 10 and policy CS7 dealing exclusively with sustainable waste management and recycling.
42. The Council provides evidence, by reference to other participating north London Boroughs' Core Strategies, that although the volume of justificatory material varies, the approach it has taken towards policy formulation is common to all participants. That demonstrates that my concerns, if not misplaced, would be unnecessary and so, this aspect of the Core Strategy is sound because of common acceptance.

### *Conclusion*

43. As submitted, Appendix 3 of the Core Strategy listed only 19 out of 158 policies in the previous Unitary Development Plan which would be superseded on the adoption of the Core Strategy. The rest would have had to await the adoption of one or more subsidiary DPDs. With the amendments now proposed, the Council is also able to propose **(197)** a revised Appendix 3 which indicates that 142 former UDP policies will expire on the adoption of the Core Strategy. That is a measure of its effectiveness and, in consequence, its soundness.

### **Issue 4 – Supporting text as policy**

44. As submitted, there were frequent passages in the Core Strategy which set out policy rather than justifying or explaining it. Although some of these are individually trivial, they sum to an extensive defect, which undermines the effectiveness and so, the soundness of the Core Strategy. The Council proposes a considerable number of changes to clarify the distinction **(18, 22, 31, 37, 43, 44, 47, 50, 51, 71, 72, 79, 81, 83, 85, 86, 89, 93, 95, 98, 99, 101, 102, 103, 113, 114, 117, 118, 119, 122, 124, 125, 126, 131, 132, 133, 134, 135, 136, 137, 138, 139,, 151, 155, 156, 157, 158, 159, 160, 161, 169, 171, 172, 176, 178, 181, 183, 187, 193)**. These are all necessary for the soundness of the plan.

### **Issue 5 – Clarity of meaning**

45. As submitted, the Core Strategy made frequent use of words such as "high quality", "low quality", "appropriate", "inappropriate", "key sites", "unjustified", "major", "small scale" and "suitable" without further qualification or elaboration. These terms are imprecise and capable of infinite interpretation, leading to argument (such as issue 11 below) and lack of clarity. Individually, each is a relatively trivial matter but collectively, they undermine the effectiveness and therefore the soundness of the Core Strategy. In most cases, the Council proposes amendments which would provide the missing clarity **(21, 22, 32, 43, 44, 45, 50, 51, 53, 64, 66, 73, 84, 96, 97, 130, 132, 137, 139, 141, 143, 144, 149, 152, 167, 168, 169, 170)**. In some cases imprecise terms have been retained where immediately associated text would make the meaning clear. These amendments are all necessary for soundness.

## Issue 6 – Missing policies

46. As submitted, the Core Strategy appeared to omit subject matter which national policy requires for a plan to be effective. These included the absence of a proposals map, a delivery strategy, figures for quantities of growth, and policies dealing with Minerals, Gypsy and Traveller accommodation, retrofitting of energy saving measures, run-off and flash flooding, aspects of parking policy, residential amenity and noise and air pollution.
47. In response, the Council has proposed amendments to the Core Strategy which would address these issues **(4, 24, 52, 67, 70, 74, 75, 76, 163, 164, 165)**. All are drawn from evidence documents supporting the plan and so do not compromise the sustainability appraisal which has been carried out. All are necessary for the Core Strategy to be effective and so, sound.

## Issue 7 – Redundant policies

48. Paragraph 4.30 of PPS 12 advises against simple repetition of government policy in a DPD. As originally submitted, the Core Strategy contradicted this precept in policies CS5(H), 8(C), 8(G), 12 and 14(E) concerned with flood risk, transport planning, heritage planning and planning for the evening economy.
49. There is a concern that, as government policy is reviewed from time to time, there is a risk that policies which the Council values would cease to apply in Waltham Forest unless repeated in the Core Strategy. Nevertheless, the Council suggests several amendments which would either delete passages or add points of local relevance to the policies **(74, 123, 125, 129, 133, 134, 152, 153, 157, 168)**. These are all necessary for the Core Strategy to comply with government policy and so be sound.

## Issue 8 – Duplication

50. As originally submitted there appeared to be a certain amount of duplication within the Core Strategy which compromised its coherence and so its effectiveness and soundness. A number of amendments are proposed **(58, 60, 91, 142, 182, 208)** which either eliminate the duplication or clarify and justify it and so are necessary for soundness.
51. In particular, policy CS1 is reordered and cross referenced to other policies to make it clear that it is the overarching policy from which most others are derived **(18, 19, 20, 21, 22)**. It includes an addition to draw out the theme of public realm improvement which was otherwise embedded within the plan, effective in practice but lacking a high profile.
52. Conversely, as submitted, chapter 13, containing policy CS10 dealing with skills training, had a high profile but appeared disconnected with other parts of the plan to which it has strong affinities, such as chapter 12, containing policy CS9 concerned with promoting education and chapter 6, containing policy CS3 concerned with employment land. A cross reference to policy CS3 is introduced **(54)**, which would assist the effectiveness of policy CS10 and so is needed for soundness.

## **Justification issues**

### **Issue 9 –Uses in primary and secondary retail parades**

53. There are two aspects to this issue. One is concerned with the principle of policy CS14(E); the other with its application.

#### *Principle*

54. The principle of the policy is justified by reference to government policy set out in Planning Policy Statement 4: *Planning for Sustainable Economic Growth* (PPS4). Policy EC3.1 of that document requires that local planning authorities should consider making a distinction between realistically defined primary and secondary frontages.

55. The historic pattern of retailing provision in Waltham Forest is accurately described in the justification for the policy. The social and economic changes which have led to that pattern being disrupted and no longer supportable are documented. The need for consolidation is justified by the evidence. The Council's Annual Monitoring Report records average vacancy levels in town centres at 8%, less than the national average of 11.4%, which demonstrates that the policy is working successfully.

56. The Core Strategy itself would not define the extent of each centre, nor the extent of the primary and secondary frontages within each; it merely specifies that retail activities would be consolidated within the core areas. That corresponds with best practice which is to place activities which attract customers, either through popularity or as a matter of necessity (described as anchor units) on the edges of core areas. The resulting pedestrian flow between the anchors provides passing trade to support a variety of retail units which might not otherwise flourish in isolation. The overall attractiveness of the retail offer in a parade or centre is thereby enhanced. The evidence that banking services generate a high footfall confirms that they act as anchor units and so I conclude that the policy of placing them in secondary frontages on the edge of a core retail area is sound.

#### *Application*

57. The Core Strategy corrects printing errors in the definition of primary and secondary frontages on the Proposals Map but, otherwise, definition of the extent of each centre and the extent of primary and secondary frontages within each would be left to the forthcoming Development Management Policies DPD.

58. As submitted, the Core Strategy did not set criteria or parameters for that exercise. That would have left it open for the subsidiary DPD simply to leave the proposals map unchanged and for previous policy to carry on without review. This is an example of issue 3 considered earlier. The Council proposes to include an additional paragraph to follow 17.14 of the Core Strategy setting criteria for the definition of primary and secondary frontages. This change **(173)** is essential for the soundness of the Core Strategy.

## Issue 10 – Pubs, bars and the night time economy

59. As submitted, various policies and explanatory paragraphs in the Core Strategy appeared to be facing in a variety of directions. There are two aspects of concern; one relates to proposed policies to deal with a decline in pubs; the other relates to policies to encourage the growth of the night time economy

### *Pubs*

60. There is evidence, recorded in paragraph 2.14 of the Core Strategy, that the local population is becoming increasingly diverse. That includes an increasing proportion of the population for whom alcohol consumption is anathema for reasons of religion. There are other, national reasons for their decline, recorded in paragraph 7.20 of the Core Strategy. So the evidence points to a continuing decline in spending power to support the traditional distribution of public houses, a consequent decline in their number and the need for a policy to plan positively for that.
61. Core Strategy paragraphs 16.18, 16.19 and 16.20, provide evidence of damage to health through the excessive consumption of alcohol. Paragraph 19.9 records the evidence of a connection between excessive alcohol and crime and disorder. Paragraph 19.10 records evidence of crime and disorder connected with licenses premises including pubs. So the evidence points to a policy of discouraging developments which might lead to excessive alcohol consumption and encouraging changes of use away from such uses.
62. Paragraph 19.11 recognises that there are some compensating advantages in pubs and so advises that a balance must be struck in individual cases. Paragraph 7.20 is consistent with that, in seeking to manage decline. Yet policy CS4A does not plan positively to manage decline but is entirely negative in requiring resistance to their loss, balanced only by reference to a set of criteria in an as yet unadopted DPD which may be subject to change or be found unsound. This is contrary to the evidence recorded in the Core Strategy and inconsistent with what paragraph 7.20 says it is trying to do. The delegation to a DPD might be thought contrary to paragraph 5.2(4) of PPS12, another example of issue 3, discussed earlier.
63. Having reviewed the Council's response to these points, I invited it to consider an amendment to policy CS4(A) making it clear that the policy is to manage, not resist, decline and setting criteria to be elaborated in a subsequent DPD. The Council puts forward a proposed change **(63)**, which is essential for soundness.

### *The night time economy*

64. Core Strategy paragraphs 19.9 and 19.10 point to the link between excessive alcohol consumption and crime and disorder. Paragraph 17.18 records the need to avoid excessive concentration of drinking establishments, yet points to Walthamstow town centre's potential for the development of a clustering of such uses. So the evidence acknowledges both advantages and disadvantages.
65. Policy CS14(E)(iii) seeks to encourage and manage clusters of such uses. It

does not seek to avoid their formation in excessive concentrations. So it does not reflect the evidence for a balanced approach. It is not developed further than government policy set out in PPS4 and so is an unnecessary duplication.

66. National policy is under review and that there is no guarantee that policy to encourage the development of a night-time economy would remain at a national level. Inclusion of the policy in the Core Strategy confirms that town centres in Waltham Forest are appropriate locations for the application of the policy. However, in recognition of the evidence that a balanced approach is needed, the Council proposes an amendment **(168)**, which I consider essential for soundness.

### **Issue 11 – Tall buildings**

67. English Heritage had concerns that Policy CS15(C) does not explicitly state where tall buildings may be appropriate or will be inappropriate within the Borough or how their proposals would be evaluated. The London Plan (2011) (policy 7.7) states that Boroughs should identify where tall buildings may be appropriate, sensitive or inappropriate. Reference is made in the last sentence of the post publication change to policy CS15(C) to “exceptional circumstances” for tall buildings to be identified in the Site Specific Allocations DPD. However it is not clear what is meant by exceptional circumstances. As submitted the policy does not comply with paragraph 5.2(4) of PPS12 which advises that subsidiary DPDs should not take the place of a Core Strategy in deciding where development should go.
68. In recognition of these points, the Council proposes several amendments, both to policy CS15(C) and to its supporting text. Deriving from the evidence of the borough’s characterisation study, these would bring the Core Strategy into compliance with the London Plan by defining both tall and medium height buildings in the context of Waltham Forest and identifying where tall buildings would be appropriate, sensitive or inappropriate. They would set criteria for the further refinement of policy within subsidiary DPDs and so would bring the Core Strategy into compliance with national policy.
69. Despite suggestions that the terms gateway sites and key entrance points into the borough, included in these criteria, are imprecise, they are commonly used planning terms. Whilst not themselves explicitly limiting the height of any building adjacent to Metropolitan Open Land the criteria suggested would provide a sufficiently clear policy framework for the evaluation of such proposals and the drafting of subsidiary DPDs. These changes **(180, 184, 185, 186)** are essential for soundness.

### **Issue 12 – Green Belt and Land Supply**

70. There are three elements to this issue. The first is the principle of the Council’s attitude to Metropolitan Open Land and Green Belt. In London, by virtue of a policy in the London Plan, Metropolitan Open Land (MOL) is treated as though it were Green Belt, so the two terms are effectively interchangeable. The other two elements concern the specific merits of the definition of two sites as MOL/Green Belt.

*In principle*

71. On the one hand, Core Strategy policies CS1(E) and CS6(A) clearly state that growth will be accommodated on previously developed land by preserving the integrity of the borough's Green Belt and Metropolitan Open Land. On the other hand, supporting text in paragraph 4.17 defines key sites within the Northern Olympic Fringe Action Area for a mixture of housing, jobs, transport, better public realm, new social infrastructure and better access to open space and the Olympic Park. These include sites within MOL/Green Belt which are, to varying degrees, previously developed land.
72. In its post-publication changes, the Council sought to clarify paragraph 4.17 by reaffirming that the "general" presumption against inappropriate developments in the green belt/MOL will apply but the qualified nature of that assurance does not remove doubt. The Council has subsequently proposed different changes which omit the reference to Green Belt/MOL. There remains a similarly qualified statement in paragraph 4.34 of supporting text, to maintain the "general" extent of Green Belt/Metropolitan Open Land. The Council proposes to remove the ambiguous sentence from paragraph 4.34 of the Core Strategy, which is helpful **(33)**, but the fundamental tension between policies CS1(E), CS6(A) and the provisions of the successor to paragraph 4.17 would remain.

*Thames Water Site, North Olympic Fringe*

73. There are several ways in which this fundamental tension could be resolved. One participant sought to resolve the tension by removal of this site from the Green Belt/MOL.
74. Many of the points made in support of this suggestion are either not relevant to the designation of land as MOL or Green Belt or were considered at a public inquiry into the Unitary Development Plan Review in 2005. I have no reason to disagree with the conclusions of the Inspector on those points where circumstances have not changed.
75. The Waltham Forest Land Availability Assessment has been largely overtaken by the more recent Strategic Housing Land Availability Assessment. That, together with the Council's Annual Monitoring Report demonstrates that the land is not needed for development in order to meet the Council's housing needs.
76. The Council's ability to demonstrate an adequate supply of land both for housing and for employment led it to choose not to undertake a review of MOL/Green Belt boundaries for the purposes of the Core Strategy. Advice in PPG2 is that the essential characteristic of Green Belts is their permanence and that once the general extent of a Green Belt has been approved it should be altered only in exceptional circumstances. In the light of that advice, the Council's decision not to undertake a review appears sound at a strategic level.
77. The council accepts that the criteria for the designation of MOL set out in the London Plan 2011 have been made more stringent. Whether it would be appropriate to apply those revised criteria in a localised review of the designation of the site during the preparation and adoption of the Area Action

Plan is a matter to be left to the examination of the soundness of that plan.

78. During the examination of the Core Strategy, the Council asserted that those sites within the North Olympic Fringe Action Area which were within Green Belt/MOL would only be developed in accordance with Green Belt policies set out in the government's Planning Policy Guidance: *Green Belts* (PPG2). It pointed to the emerging Area Action Plan DPD as supporting evidence for its view that there was no inconsistency between policies CS6(A), CS1(E) and its supporting text replacing paragraph 4.17.
79. That does not fully answer the landowner's point that these aspirations for enhancement and change of use of the site require enabling development, not consistent with MOL designation. A fuller response is that enabling development might be one way of funding the aspirations of the AAP but it is not the only way. The way in which the proposals of the Area Action Plan would be funded is an issue questioning its soundness not that of the Core Strategy. The appropriate place for its consideration would be during the examination into the soundness of the Area Action Plan.
80. A related factor is that the site lies within the boundaries of the Lee Valley Regional Park Plan. (All other references to the River are spelt Lea but the Regional Park Authority is spelt Lee). The Lee Valley Regional Park Authority (LVRPA) is a statutory body created by the Park Act of 1966. Section 14(1) of the Act requires the LVRPA to prepare a plan setting out proposals for the future development of the park. Riparian authorities (of which Waltham Forest is one) are required to include the relevant parts of the Lee Valley Regional Park Plan within their own development plans whether they agree with them or not.
81. At the time of this examination, the LVRPA is in the process of replacing its Park Plan 2000 by a Park Development Framework which will be the Plan to be incorporated into the Waltham Forest Local Development Framework. The LVRPA's Proposals for the Three Marshes part of the park (including part of Waltham Forest) are due to be adopted by the LVRPA on 20<sup>th</sup> October 2011. If adopted its provisions will need to be incorporated into the Core Strategy and/or the North Olympic Fringe Area Action Plan on their adoption.
82. The draft of the proposals being recommended to the LVRPA for adoption makes reference to the Thames Water site in a number of places. Although this identifies the scope for new water based facilities at sites such as the Thames Water depot and proposes new leisure and recreation facilities including a waterside visitor hub, a biodiversity and/or heritage related visitor attraction, accommodation serving visitors to the park, community related activity and uses and new recreational or sporting facilities for the site, it makes it clear that the type, scale and design of any development would need to be appropriate in terms of the site's designation as Metropolitan Open Land and its location within the heart of the regional park.
83. There is nothing in this to support the removal of the MOL designation from the Thames Water site. On the contrary, the draft LVRPA proposals make it clear that it will seek to have similar sites, even where located on the edges of the park, designated as MOL and it will resist the development for non park-related uses of those which are already so designated. If the draft LVRPA

proposals are adopted before the adoption of the Core Strategy then the Core Strategy will have to incorporate those proposals. The amendments needed to do so **(110)** are necessary for legal compliance with the Lee Valley Regional Park Act.

#### *Kingfisher site*

84. As with the Thames Water site, many of the points made in support of the deletion of this site from the Green Belt are irrelevant to the reasons for designation of land as MOL/Green Belt. Whatever deficiencies the terminology of policy CS1(E) might have, policy CS6(A) is clear and unambiguous. As already noted, the Council's decision not to undertake a review of Green Belt/MOL boundaries is sound at a strategic level. The evidence of employment land supply and for the continuing need to retain playing pitches is recent and does not suggest the need for a review of Green Belt/MOL designations.

#### *Conclusion*

85. There is tension between policies CS1(E), CS6(A) and the successor to paragraph 4.17 but it is capable of resolution and so does not make the Core Strategy unsound. The amendments which remove some of the ambiguities of the document **(33)** are necessary for its clarity and so necessary for soundness. The decision to make no review of the boundaries of MOL/Green Belt is sound at a strategic level. The viability and arrangements for implementation of the individual proposals in the North Olympic Fringe Area Action Plan is a matter for analysis in the examination of that DPD; it is not a matter which would make the Core Strategy unsound. There is insufficient evidence to suggest that the omission of any proposal to exclude either the Thames Water site or the Kingfisher site from MOL/Green Belt designations would make the Core Strategy unsound.

### **Issue 13 – Affordable Housing**

86. Two participants raised two issues concerning the justification for policy CS2(B). The first concerns the element of the policy requiring 50% of all new homes to be provided as affordable housing. The second concerns the balance between social rented housing and intermediate housing within the affordable housing total.

#### *Level of affordable housing*

87. As submitted, policy CS2(B) set a target figure of 50% affordable housing over the plan period. Supporting text then explained how the Council would evaluate proposals for individual sites offering less than the 50% target.
88. In response to the representations and to my questions, the Council recognises that the supporting text represents policy. It therefore proposes two amendments to policy CS2(B); one to make it clear that the level of affordable housing would be assessed on a site by site basis; the other to transfer the supporting text of paragraph 5.16 of the plan into policy CS2(B). That would make it clear that although the overall target of 50% would remain, each site proposing less than that would be assessed individually by reference to a dynamic viability model which would relate the level of

affordable housing to market factors.

89. The evidence of the East London Strategic Housing Market Assessment August 2010 shows that far more than 50% affordable housing is needed. The Affordable Housing Viability Study February 2010 shows that, at the peak of the market, private sector developments were capable of supporting that level of affordable housing. The figure is much less in present market conditions. From this evidence it follows that an approach which sets the highest target which evidence shows to have been achievable but with a mechanism for allowing reductions to reflect changing market conditions is a sound one. The proposed amendments **(37)** to the Core Strategy would produce such a policy and so are necessary for soundness.

#### *Balance within affordable housing provision*

90. As submitted, policy CS2(B) sought to subdivide affordable housing provision between social rented housing and intermediate housing in the ratio 60:40. The Housing Needs and Market Survey 2007 advises that the Council "could" consider a tenure mix target of 60:40 but "may" vary it on a site by site basis. The subsequent Affordable Housing Viability Study of February 2010 points out that this figure is unsupported by evidence.
91. The later study provides evidence. It would justify a 70:30 split. However, it points out that the total quantity of affordable housing to be provided during the plan period is likely to be less than the total needed. Therefore, any split other than 70:30 would merely place an emphasis on where the shortfall would lie. It advises that the exact split would have no implications for viability; that the evidence for a 70:30 split is consistent with an emerging policy target (in the London Plan) of 60:40; that the target is a policy decision that should have regard to but not be dictated by the facts on the ground.
92. As already noted, the Council proposes an amendment to make it clear that the provision of affordable housing will be assessed on a site-by site-basis. That amendment **(37)** is necessary for soundness. Given that the evidence suggests that the difference between a 60:40 and a 70:30 split is of little significance and is a matter for local choice, I conclude that the policy would be sound.

#### **Issue 14 – Dwelling mix**

93. The East London Strategic Housing Market Assessment (the ELSHMA) offers six scenarios of the future housing market in East London. Some of these show that if demand were not constrained by supply there would be a surplus of three bedroomed market sector accommodation in Waltham Forest.
94. However, the ELSHMA also analyses what would be the reaction of the market to a constrained situation, where the needs for affordable housing are not met in full, as would be the case in Waltham Forest. It advises that while boroughs can clearly not achieve over 100% of affordable housing on new dwellings, change in the second hand market can see market dwellings become part of the affordable housing stock (ELSHMA paragraph 6.134).
95. Evidence shows that this has been happening in Waltham Forest. A comparison of the 2001 census data, the Housing Needs and Market Survey

2007 and the House Condition Survey 2011 shows a marked decline in owner occupation in Waltham Forest. It has declined by about 12,500 dwellings from 58% of the stock in 2001 to about 46% of the stock in 2011, an annual rate of about 1,250 dwellings. At the same time, privately rented dwellings have increased in number by about 16,500 dwellings from 17% of the stock in 2001 to about 32% of the stock in 2011, an annual rate of increase of about 1,650. Over the same period, the stock of housing association or Council rented properties has remained fairly constant.

96. The shift in tenure from home ownership to renting has been accompanied by an increase in the number of households claiming housing benefit support. Evidence given to the hearing is that this increase has been at the rate of about 1,000 households per annum in recent years. In this way, the private rented sector has become an arm of affordable housing and the statistical surplus of larger family houses is removed from the home ownership market.
97. Although the modelling of market demand in the ELSHMA indicates that it should be for smaller dwellings, the demand from existing moving households surveyed in the Waltham Forest Housing Needs and Market Survey of 2007 (paragraph 11.2.5 and table 11-3) shows that 58.7% of demand was for three or more bedrooms. In this light there is nothing to demonstrate that the Waltham Forest approach would be unsound.
98. Furthermore, irrespective of tenure, which can change, the evidence demonstrates that property types in Waltham Forest are historically skewed towards smaller units. Policy CS2(C) would not require three bedroomed homes to the exclusion of other sizes of dwelling; the policy also requires a range of home sizes so the priority it would give to larger homes would simply redress the balance. It is therefore sound as submitted.

### **Issue 15 – Needs of small and medium-sized enterprises**

#### *Policy CS1(E)(iii)*

99. One participant asserts that policy CS1(E)(iii) would not be effective and should be reworded but there is no evidence to support such a view.

#### *Policy CS3*

100. Between them, policies CS3 (A), (B), (D) and (E) put into effect the recommendations of the London Borough of Waltham Forest 2009 Employment Land Study. This study was carried out in line with the government's Guidance Notes on Employment Land Reviews. It identifies clusters and networks of land in employment use. It surveys them and takes advice from local property professionals. It identifies surplus industrial or warehousing land which could be released for other uses. It also identifies a relative lack of suitable and affordable intermediate premises for small and medium enterprises. It pays particular attention to the needs of premises for smes and identifies locations suitable for them. The policies based on this evidence specifically allow for mixed used developments in growth areas suitable for small and medium-sized enterprises. Assertions to the contrary fail to demonstrate that the evidence, or the Core Strategy policies based on it, would be unsound.

### *Uplands Business Park*

101. This issue encapsulates a disagreement between the landowner and the Council's consultant employed to conduct the 2009 Employment Land Study. The disagreement concerns the condition of the Uplands Business Park and its prospects for future use. Whilst respecting the local knowledge of the landowner of this estate, no evidence was offered in support of the assertions made, whereas there is clear evidence in the Employment Land Study that a close examination has been made of the Blackhorse Lane employment cluster.
102. This records that it is a well-established industrial area with a number of good quality estates mainly in the north of the cluster (Uplands Park is located towards the north of the cluster). It is reported to have dedicated parking, good access and generally appears to be functioning well for its purpose. Vacancy rates are reported as normal except in the south of the cluster. A site visit did not indicate this appraisal to be mistaken. The southern end is to be excluded from the Strategic Industrial Location designation in accordance with the evidence of the Employment Land Study. Accordingly, I conclude that Core Strategy policy CS3 is soundly based.

### *Sutherland Road*

103. The Council justifies its approach to this area by reference to its concept of increasing the intensity with which employment land is used and so creating surplus land which can be released for other development. The issues raised by a participant are similar to those raised in relation to Uplands Business Park. As stated above, the evidence of the Employment Land Study shows that the approach of the Core Strategy to the designation of protected employment areas is sound.

## **Issue 16 – Carbon emission targets and standards**

104. Participants raised three points in relation to policy CS5(B). This policy would require developments to meet high environmental standards of building design and construction including targets based on standards such as BREEAM and the Code for Sustainable Homes (CfSH).

### *Unnecessary*

105. The Council contends that its policy would extend wider than the Building regulations and encompass higher standards of sustainable design across the range of criteria that are covered in the Codes and BREEAM (Energy/CO<sub>2</sub>, Water, Materials, Surface Water Runoff, Waste, Pollution, Health and Wellbeing, Management and Ecology). The Codes/BREEAM address more sustainability criteria than the current building regulations and the Council considers standards such as CfSH/BREEAM a useful tool in addressing the overall sustainability of buildings (beyond the carbon reduction requirements). The Council therefore provides further detail and targets on these standards in the Development Management DPD (DM 11).
106. The Council's response demonstrates that the policy goes beyond the Building Regulations. It would not simply duplicate them and so the policy would not be unsound. It is justified by the analysis of the Council's Climate Change Evidence Base Study, particularly paragraph 6.36 and chapter 8.

### *Setting standards*

107. The Council contends that the Core Strategy sets the strategic context. The Development Management Policies are criteria based policies that define targets and standards and therefore add further detail. Policy CS5(B) does not require developments to exceed BREEAM or CfSH standards; it requires them to meet the standards that will be set in the Development Management DPD. The Council does not want to duplicate development management policies in the Core Strategy. Nevertheless the Council wishes to strengthen the justification for standards in excess of CfSH and BREEAM and suggests an amendment to paragraph 8.12, **(75)** which I endorse. In the light of the Council's explanation, there is no reason to conclude that the policy would be unsound.

### *Viability*

108. Paragraph 33 of the PPS1 climate change supplement advises that any policy relating to local requirements for energy supply should ensure that what is proposed is evidenced based and viable having regard to overall costs of bringing sites to the market. The Council points out that it has recently undertaken a climate change viability assessment, which will provide the evidence for setting carbon reduction targets and environmental standards in the Development Management DPD (Policy DM11). In the light of the Council's explanation, which is that evidence to support the standards proposed will be provided in the preparation of a subsequent DPD, there is no reason to conclude that the policy in the Core Strategy would be unsound.

### **Issue 17 – Walthamstow Stadium**

109. There are representations from the landowner of the now closed Walthamstow Greyhound Stadium and from a pressure group campaigning for its re-opening. Both groups have specific proposals for the site but the issues for the examination of the Core Strategy are whether a revival of the leisure use is needed, justifiable and viable or whether the site is required for development to meet the needs of Waltham Forest identified in the Core Strategy.

110. Both interested participants have proposals which involve a mixed development of the site to greater or lesser degrees. To that extent, the evidence confirms that the land is a development site. Its size means that it is appropriate for the Core Strategy to make specific reference to it.

111. The London Plan 2011 sets Waltham Forest an annual housing target for monitoring purposes of 760 dwellings. That represents 11,400 dwellings over the fifteen-year lifetime of the plan. The Waltham Forest Housing Land Availability Assessment by Entec of February 2008 was able to identify a capacity in a range of 10,595 – 15,623 dwellings. The London Strategic Housing Land Availability Assessment and Housing Capacity Study 2009 was able to identify a ten-year supply for Waltham Forest of 8,760, equivalent pro-rata to a fifteen-year supply of 13,140 dwellings. Both are evidence of capacity in excess of target and so the Council's view that no one site, even one as large as the former greyhound stadium, is crucial to the attainment of the target is substantiated.

112. Criticism is made of the potential viability of the site for Greyhound racing, based on the continued decline in attendance at venues elsewhere. Although doubt is thus thrown on the economics of one proposal for the site, the evidence does not conclusively demonstrate that greyhound racing would be unviable. Like any business, much would depend on its management, but there is insufficient evidence to conclude that a proposal for greyhound racing would be unviable.
113. The argument for saying that there should be greyhound racing provided at the site includes a view of the status of the site within the sport. It is described as "iconic"; a flagship site, comparable to Wimbledon for tennis or Twickenham for rugby. In two letters from the Greyhound Board of Great Britain, it is described as "a magnificent venue with a rich 75 year heritage", "much loved", attracting the highest crowds of any greyhound racecourse in the world.
114. Yet, other than noting that it generated a high level of off-course betting turnover, important to the funding of the industry as a whole, there is no evidence to suggest a need for such a stadium in such a place. The stadium has been closed for three years, yet no evidence was produced, or suggested, that its closure has had an adverse effect on the sport as a whole. There is no corporate plan for the greyhound racing industry and so no evidence to demonstrate a continuing need for a flagship stadium at this location in Waltham Forest.
115. The London Plan is silent on the need for greyhound racing provision within London, so there is no evidence of a regional need for such a facility. The Retail and Leisure Study of Waltham Forest commissioned by the Council from Nathaniel Lichfield and Partners examines the need for various commercial leisure uses in the borough. It advises that there is limited potential for major commercial leisure facilities within Waltham Forest Borough, suggesting potential only for a 4-5 screen multiplex cinema, private health club facilities and possibly small to medium night club facilities. It appears that the case for re-use as a greyhound stadium is based on history and sentiment, not objective need.
116. That conclusion does not deny the previous popularity of greyhound racing in Waltham Forest. Nor does it deny current popular support for the idea of its resurrection. What it does confirm is that the approach of the Core Strategy, which is to identify the site as an important one and to identify the need for development of a mixture of uses including housing, employment, leisure and community uses, without specifying any particular mix or quantity, is the correct one. An amendment to the policy is proposed for different reasons, discussed elsewhere, but not one which would fundamentally alter the Core Strategy's permissive approach **(20)**. I conclude that it would be sound.

### **Issue 18 – Whipps Cross Hospital housing site**

117. There is a representation to the effect that development on underused land at Whipps Cross Hospital would be neither justified nor sound because the only possible vehicular access would be on to the severely congested Whipps Cross Road. A site visit established that there is a large area in the north-western corner of the hospital precinct which is derelict, apparently surplus to

requirements and available for development. It is therefore right that it should be identified as a development site.

118. Regardless of the desirability or otherwise of the use of Whipps Cross Road as an access, there is clearly an alternative access available by using a strip of land passing between Halford Road and West End Avenue to gain access to Lea Bridge Road. Other accesses may be feasible which are not apparent from a site visit. There is therefore no reason to conclude that the inclusion of reference to this site within policy CS1(C) would be unsound.

### **Issue 19 – Mitigation for Special Protection Areas (SPAs)**

119. The Habitat Regulations Assessment of the Core Strategy advises that new development in close proximity to the Lee Valley SPA/Ramsar will require incorporation of measures into the Area Action Plans to ensure that a clear policy framework exists for mitigating these adverse effects on the ground (e.g. appropriate screening, timing and best practice during construction). However, it also advises that this level of detail does not require definition within the Core Strategy. I have no reason to disagree with that assessment.

120. Natural England commented on the published plan that certain policies may have potential negative impacts on biodiversity and the natural environment (e.g. Policy CS2 – Improving Housing Quality and Choice and Policy CS11 – Tourism and Visitor Attractions). Appropriate protection and, if necessary, robust mitigations were expected to be delivered to ensure that adverse impacts on biodiversity and green space are removed and/or minimised.

121. The council's post publication change to paragraph 14.12 **(151)** referred to the Development Management DPD and to the possibility of mitigation measures being required. Natural England notes that the Council's post publication changes will satisfy the point made in its representation seeking protection or robust mitigation of biodiversity and green spaces within the borough. It is therefore a change necessary for soundness.

122. There is a tension between this change and the existing reference in paragraph 9.13 to suitable alternative open spaces (SANGS) on the one hand and, on the other, the proposal to promote greater public use of Walthamstow Wetlands.

123. The Council explains that public access to the SPA and RAMSAR sites is currently poor. Both the need for SANGS, and the promotion of Wetlands, are to help meet open space standards for residents. It is likely that significant improvements to the access of these sites, through the Walthamstow Wetlands project, will attract visitors from the wider region. Whilst at face value, the need to find alternative sites to relieve pressure on environmentally sensitive areas, and the simultaneous promotion of additional use of the Wetlands may seem contradictory, it is important to note that any increase in use of the Wetlands needs to be done sensitively, and carefully managed. On this basis, paragraph 9.18, the last sentence of CS6, part (D) of CS11 and the post- publication change to 14.12 of CS11 are important.

124. The Council points out that the Walthamstow Wetlands project is being supported and delivered by a range of partners including Natural England, the Environment Agency and the Lee Valley Regional Park who have an interest in

the protection and enhancement of natural assets. This will ensure that nature conservation assets are considered from the outset of the project. Intervention in the area will be beneficial overall due to structured investment in habitat enhancement and long-term monitoring.

125. The Council accepts that the Habitat Regulations Assessment identified the need to provide alternative open spaces to the SPA and RAMSAR sites. It points out that Appendix 1 of the Core Strategy outlines a wide range of projects which will deliver improvements to the quality and access to open spaces in areas less sensitive for nature conservation.

126. In the light of the Council's response, I asked them to consider a further amendment to rephrase the fifth sentence of paragraph 9.13, which they now accept. This amendment (107) would provide a clearer explanation of the way the Core Strategy has implemented the recommendations of the Sustainability Appraisal and the Habitat Regulations Assessment and so would be necessary for soundness.

## Legal Requirements

127. The examination of the compliance of the Core Strategy with the legal requirements is summarised in the table below. I conclude that the Core Strategy meets them all.

<b>LEGAL REQUIREMENTS</b>	
Local Development Scheme (LDS)	The Core Strategy is identified within the approved LDS April 2011 which sets out a submission date of May 2011, an examination date of September 2011 and an expected adoption date of December 2011. The Core Strategy's content and timing are compliant with the LDS.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in June 2007 and consultation has been compliant with the requirements therein. The SCI does not make specific provisions for consultation on the post-submission proposed changes but these were publicised on the council's website and by individual notification to participants and representations invited on them.
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Appropriate Assessment (AA)	The Habitats Regulations Assessment Report May 2011 by URS/Scott Wilson concludes that significant effects are unlikely to occur on any European sites as a result of Core Strategy development, either alone or in combination with other plans and projects. Natural England confirms that it is satisfied with the methodology used in the report. It concludes that the Council does not need to undertake stages 2 and 3 of the Habitats Regulations Assessment, the Appropriate Assessment.

National Policy	As submitted the Core Strategy omitted to comply with national policy in a number of respects. These were brought to the Council's attention. The Council put forward a number of changes in consequence. They are endorsed in Appendix A. With these changes in place, the Core strategy will comply with national policy.
Regional Strategy (London Plan)	With the post-publication minor changes in place, the Mayor for London confirms that the Core Strategy would be in general conformity with the London Plan.
Sustainable Community Strategy (SCS)	The structure of the Core Strategy is inspired by the Waltham Forest Sustainable Community Strategy "Our Place in London" adopted in May 2008. Core Strategy policies correspond to Community Strategy priorities.
2004 Act and Regulations (as amended)	The Core Strategy complies with the Act and the Regulations.

## Overall Conclusion and Recommendation

128. I conclude that with the changes proposed by the Council, set out in Appendix A, marked S, the Waltham Forest Local Development Framework Core Strategy DPD satisfies the requirements of s20(5) of the 2004 Act and meets the criteria for soundness in PPS12. Therefore I recommend that the plan be changed accordingly. And for the avoidance of doubt, I endorse the Council's proposed minor changes, set out in Appendix A marked M.

*P. W. Clark*

Inspector

This report is accompanied by:

Appendix A Council Changes marked (S) that go to soundness and (M) which are minor Changes

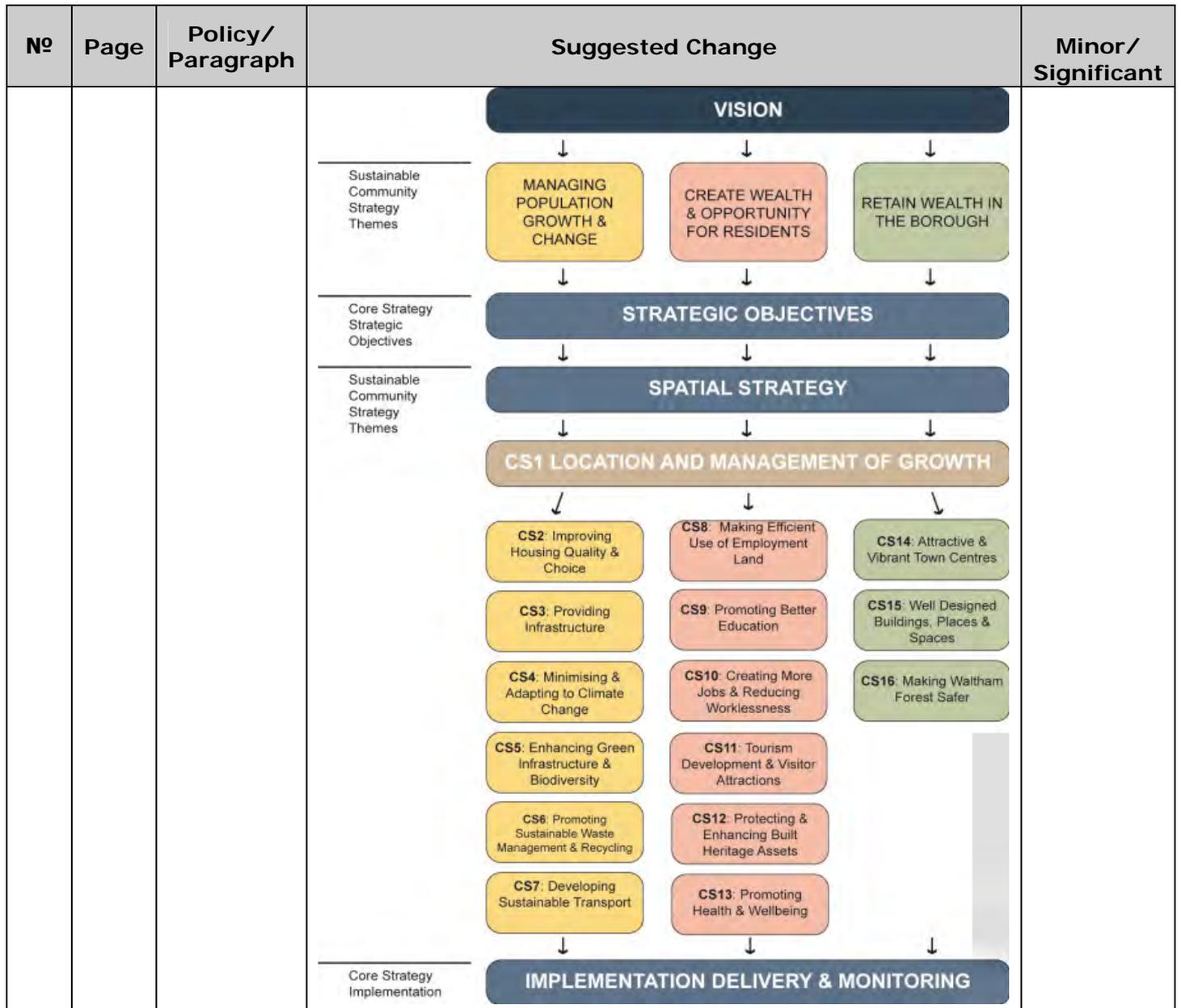
## Examination into the Waltham Forest Core Strategy DPD

### Appendix A SCHEDULE OF SUGGESTED CHANGES

The changes below are expressed either in the conventional form of ~~strikethrough~~ for deletions and underlining for additions of text, or by specifying the change in words in *italics*.

The page numbers and paragraph numbering below refer to the published DPD January 2011, submitted on 31 May 2011 and do not take account of the deletion or addition of text. For completeness, the changes include those previously published by the Council as Post Publication Minor Changes, also submitted in May 2011 unless superseded.

<b>Nº</b>	<b>Page</b>	<b>Policy/ Paragraph</b>	<b>Suggested Change</b>	<b>Minor/ Significant</b>
1	3	1.7	<i>Amend second sentence "It seeks <u>to</u> <del>co-ordinates</del> <u>co-ordinate</u> and plan for....".</i>	M
2	7	Vision	<i>Substitute with attached diagram, make consequential changes to Table 1 and reorder and renumber chapters 6 to 11 of the Core Strategy</i>	M



3	19	2.27	<i>Delete first sentence. Amend second sentence; The borough <del>however</del> has a significant set of cultural assets</i>	
4	20	After 2.33	<i>Insert new sub heading and text; Minerals: Planning for aggregates at the strategic level is provided by the London Plan. Waltham Forest has no requirement for a landbank apportionment in the London Plan. However the London Plan notes that there could be some potential for aggregate extraction beyond the boroughs identified. There is no history of gravel extraction in Waltham Forest in the recent past. As far as is known, the only materials present are gravels laid in shallow deposits across much of Leyton and South Walthamstow. They are mainly built over and their extraction is unlikely to be practical either in environmental or economic terms. Other deeper deposits are understood to be located in the Lee Valley, mainly on protected land owned by the Lee Valley Regional Park Authority and Thames Water plc. The Core Strategy makes no provision for mineral extraction</i>	S

			or handling as there is currently no such activity in the primary sector of the economy. For the provision and supply of minerals generally, Waltham Forest relies on alternative handling facilities elsewhere in London and from other regions, including the South East and East. Any proposals forthcoming would be considered in relation to Policies CS3(F), CS8(J) and also Policy DM39 of the emerging Development Management Policies Document".	
5	21	2.38	<i>Delete first sentence and substitute; "In Waltham Forest, we value of all our heritage assets whether they are designated such as listed buildings, conservation areas, archaeological sites and registered parks and gardens and also other types of heritage assets. These include locally listed buildings, gardens and spaces identified by the Local Historic Parks and Gardens Trust and other elements of Waltham Forest's environment that are of historic interest".</i>	M
6	21	2.40	<i>Amend last sentence; For example, listed buildings could be seen as too complicated and difficult to work with as they are may be perceived to be associated with higher costs for restoration and maintenance.</i>	M
7	22	2.45	<i>Amend fourth sentence; Open spaces offer numerous benefits ranging from economic, social and environmental benefits</i>	M
8	22	2.45	<i>Amend penultimate line; deliver provide and manage</i>	M
9	22	2.48	<i>Add after third sentence; This plan also recognises the need to promote and where appropriate enhance transportation linkages and relationships with neighbouring regions.</i>	M
10	24	2.57	<i>Insert opening sentence; Infrastructure can be defined as the facilities and services that allow communities to function and develop.</i>	M
11	25	After 2.57	<i>Add; Green Infrastructure is the network of multifunctional green spaces and their connections that enable the environment to support and maintain ecological processes, whilst sustaining land, air and water resources and is important within, and beyond urban spaces. Physical Infrastructure includes utilities (gas, electricity, telecommunications, water supply, sewerage network, drainage), transport services (roads, buses, trains, etc); and waste collection and disposal including recycling facilities. These are the services and facilities necessary to ensure that homes and workplaces are connected to the wider environment and have sufficient facilities to ensure that essential day to day services can be met. To allow communities to function and develop the delivery of such infrastructure will also be required.</i>	M
12	26	3.5	<i>Amend to read; Our new homes are of a high quality homes and are very sustainable.</i>	M
13	26	3.6	<i>Amend fourth line; of East London and beyond</i>	M
14	27	3.9	<i>Amend second line; universities colleges</i>	M
15	27	Heading 3.10	<i>Amend; Greenest</i>	M
16	27	3.10	<i>Amend first line; Lea-Lee</i>	M
17	27	3.10	<i>Amend third line; Our parks open spaces</i>	M

18	31	CS1(A)	<p><u>Add; The Council will seek to provide growth in these areas as follows:</u></p> <ul style="list-style-type: none"> <li>• <u>Blackhorse Lane - up to 2500 new homes, about 1000 new jobs.</u></li> <li>• <u>Northern Olympic Fringe - up to 2500 new homes,</u></li> <li>• <u>Walthamstow Town Centre - up to 2000 new homes</u></li> <li>• <u>Wood Street - up to 1000 homes</u></li> </ul> <p><u>(see policies CS2, CS3 and CS10 in particular)</u></p>	S
19	31	CS1(B)	<p><u>Add; (see policies CS3, CS10, CS11 and CS14 in particular)</u></p>	S
20	31	CS1(C)	<p><u>Amend; Encouraging high quality development that will benefit the wider community including housing, employment, leisure and community uses at sites including Walthamstow Dogs Stadium, Chingford Municipal Offices and underused land at Whipps Cross Hospital. Sites to be taken forward will be selected from the Site Opportunity Locations shown on (map A) by Area Action Plan and Site Specific Allocations DPDs. Precise boundaries and details of the proposals planned will be set out in those DPDs.</u></p> <div data-bbox="475 817 1125 1803" style="text-align: center;"> <p><b>Map A</b></p> </div>	S
21	31	CS1(D)	<p><u>Amend; Outside the identified growth areas and within the borough generally, protecting local areas from inappropriate developments and improving character areas, ensuring that proposals contribute positively to urban quality. (see policies CS2, CS6, CS11, CS12, CS13, CS15 and CS16 in particular)</u></p>	S

22	31	CS1(E), (F) and (G)	<p><i>Amend;</i></p> <p>E Accommodating growth on previously developed land by:</p> <p>(i) <del>preserving the integrity of the borough's Green Belt and Metropolitan Open Land and ensuring effective management of these to enhance the quality of life for borough residents and visitors using land more efficiently (see Policies CS2 and CS3 in particular)</del></p> <p>(ii) <del>not permitting development, where its construction or direct use would significantly and adversely affect the international designations of the Lea Valley water bodies. Developments will incorporate all measures necessary to avoid adverse effects on the Lea Valley Special Protection Area and Ramsar through proximity of development protecting designated sites and areas (Green Belt, Metropolitan Open Land, Special Protection Areas, Ramsar sites, Conservation Areas and Listed Buildings) (see policies CS6, CS12 and CS15 in particular)</del></p> <p>(iii) <del>safeguarding land for housing and employment uses in designated employment areas, ensuring that the best and most suitable sites and premises are retained for employment use to provide well paid jobs for local people (see Policies CS2 and CS3 in particular)</del></p> <p>(iv) <del>using redevelopment opportunities to improve the quality of the public realm (see policies CS6, CS8, CS13, CS15 and CS16 in particular) land more efficiently by encouraging appropriate mixed use developments and greater intensification of activities particularly in the identified growth areas and other key sites.</del></p> <p>(v) <del>applying a range of policy mechanisms set out in this strategy to tackle (F) tackling climate change locally. (see policies CS5, CS7 and CS8 in particular)</del></p> <p><del>F-G) ensuring the timely delivery of essential infrastructure to support growth (See Policies CS4, CS8, CS9 and CS10 in particular) including;</del></p> <ul style="list-style-type: none"> <li><del>• the delivery of key improvements to the borough's public transport network – including the committed/planned upgrades to the Victoria Line and Barking Gospel Oak Overground Line, the proposed reinstatement of the Chingford Stratford Line and the Lea Bridge Station, and other improvements to the local transport network as outlined in the Council's emerging Local Implementation Plan;</del></li> <li><del>• provision of supporting infrastructure including schools, health facilities etc, and other physical infrastructure such as utilities. This strategy includes an Infrastructure Delivery Plan (See Appendix 1) to ensure the timely delivery of essential infrastructure; and</del></li> </ul> <p><del>G-H) applying a comprehensive set of actions to implement the plan strategy including:</del></p> <ul style="list-style-type: none"> <li><del>• Resisting any proposed development that will prejudice the future development of a neighbouring site and or prohibit the comprehensive development of a larger site</del></li> <li><del>• Cross borough working to promote and maximising funding opportunities available to the Council and its partners through planning obligations, a tariff charging</del></li> </ul>	S
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			<p>schedule, bidding and funding regimes, establishment of Business Improvements Districts and</p> <ul style="list-style-type: none"> <li>• where necessary, use of compulsory purchase powers to tackle land issues which inhibit regeneration.</li> </ul>	
23	32	4.5	<u>Add to final sentence; and where there is capacity for change without harming the existing historic and local character.</u>	M
24	32	4.6	<u>After second sentence, insert; "In accordance with PPS25, a sequential test on these areas has been undertaken."</u>	S
25	33	4.9 to 4.13	<p><u>Delete paragraphs 4.9 to 4.13 and substitute;</u>  <u>Blackhorse Lane is an important gateway site for the borough to be developed over the next 10-15 years. It falls within the Upper Lee Valley, which is recognised by the Mayor of London as a major opportunity area for intensification of uses. The GLA's forthcoming Upper Lee Valley Opportunity Area Planning Framework therefore identifies the site as an important growth area where better use of land can result in sustainable new homes, space for new businesses, and better access to open spaces.</u>  <u>The Council is preparing an Area Action Plan to ensure development opportunities are co-ordinated to secure maximum community gains. It is anticipated that the area can accommodate in the region of 2500 new homes and 1000 new jobs. Other key elements of emerging proposals include:</u></p> <ul style="list-style-type: none"> <li>• <u>Higher density developments close to the station, including provision of a new neighbourhood centre with new shops and social infrastructure</u></li> <li>• <u>Improved public access to Lee Valley Regional Park and Walthamstow Wetlands, including through the provision of a new linear park</u></li> <li>• <u>New business spaces for an emerging creative industries sector</u></li> <li>• <u>Improved pedestrian crossings at the Standard Junction</u></li> <li>• <u>New pedestrian and cycle routes along the waters edge towards the Olympic Park</u></li> </ul> <p><u>To reduce the possibility of the Lea Valley Special Protection Area and Ramsar being subject to adverse effects of urbanisation, it will be necessary to ensure that development proposals do not adversely affect these international designations which are in close proximity to this growth area (Waltham Forest Local Development Framework Habitats Regulations Assessment 2010).</u></p>	M
26	34	4.14 to 4.18	<p><u>Delete paragraphs 4.14 to 4.18 and substitute;</u>  <u>Northern Olympic Fringe is a high profile regeneration site with growth potential due to its proximity to the Olympic Park and Stratford City. The Council's vision seeks to capture benefits associated with the investment arising from the regeneration of Stratford and the Lower Lea Valley and to secure employment opportunities for deprived communities. The GLA's Olympic Legacy Supplementary Planning Guidance envisages that the site and the areas within and around the Olympic site at Stratford should change to help achieve the lasting transformation of East London.</u></p> <p><u>The Council is preparing an Area Action Plan to ensure development opportunities including the provision of up to 2500 new homes, new jobs, improved transport facilities, better public realm, new social infrastructure, better access to</u></p>	M

			<p><u>green spaces and improved access to the Olympic Park. Other key elements of emerging proposals include:</u></p> <ul style="list-style-type: none"> <li>• <u>High quality new homes, jobs, training and skills</u></li> <li>• <u>Olympic legacy enhancements including hockey, football, tennis areas and playing fields</u></li> <li>• <u>Street improvements at Leyton High Road, Temple Mills Lane and Orient Way;</u></li> <li>• <u>Improved cycle and pedestrian routes along Dagenham Brook, and Ruckholt Road linking to the Olympic park</u></li> <li>• <u>Improved public access to Lee Valley Regional Park and Walthamstow Wetlands Landscape Character Area</u></li> <li>• <u>Transport hubs at Leyton station entrance and ticket hall</u></li> <li>• <u>Redevelopment of redundant industrial sites to promote regeneration</u></li> <li>• <u>The re-opening of Lea Bridge Station to connect the north of the Borough with Stratford.</u></li> </ul> <p><u>To reduce the possibility of the Lea Valley Special Protection Area and Ramsar being subject to adverse effects of urbanisation, it will be necessary to ensure that development proposals do not adversely affect these international designations which are in close proximity to this growth area (Waltham Forest Local Development Framework Habitats Regulations Assessment 2010).</u></p>	
27	35	4.19 to 4.22	<p><i>Delete paragraphs 4.19 to 4.22 and substitute;</i></p> <p><u>Walthamstow Town Centre is a vibrant urban centre that boasts a diverse community and historic buildings which is proving increasingly popular with commuters wishing to take advantage of the centre's excellent public transport links. Walthamstow is at the heart of the borough, both geographically and economically. It is the borough's main commercial centre, driving the economy and attracting visitors.</u></p> <p><u>The Council is preparing an Area Action Plan to maximise development opportunities and deliver the long term regeneration of the centre. The vision for Walthamstow Town Centre is of a sustainable town centre, providing up to 2,000 new homes, building on the cultural diversity of the community, specialist shops and market, a well developed cultural and leisure offer and integrated transport links. It is intended that Walthamstow will become an exemplar for sustainable living with daily needs being met within the town centre, removing the reliance on cars, providing local job opportunities and increasing the opportunities for social interaction and the development of community cohesion.</u></p> <p><u>Other key elements of emerging proposals include:</u></p> <ul style="list-style-type: none"> <li>• <u>Building high quality new homes in the centre providing a range of home sizes and tenures;</u></li> <li>• <u>Increasing the retail floorspace while improving and further diversifying the retail and leisure offer in the centre and further encouraging the night-time economy;</u></li> <li>• <u>Providing additional social infrastructure to meet the needs of emerging and existing communities;</u></li> <li>• <u>Providing additional commercial space for emerging and creative industries.</u></li> <li>• <u>Improving pedestrian and cycle routes into and within the</u></li> </ul>	M

			centre; and • <u>Improving the public realm to create a safer and more inclusive environment.</u>	
28	36	4.24	<i>Delete paragraph 4.24 and substitute;</i> <u>Wood Street is a small linear district centre with a good range of independent and niche retailers. However, it is also a deprived neighbourhood with housing estates in need of improvement and a number of underused spaces which provide the opportunity for redevelopment. The Council is preparing an Area Action Plan to deliver growth and change in this area. It is anticipated that this area could provide up to 1000 homes.</u>	M
29	37	4.27	<i>In line 7; delete regeneration, substitute growth</i>	S
30	37	4.28	<i>Add to end of second sentence; and impacts on local character</i>	M
31	37	4.29	<i>Delete paragraph 4.29</i>	S
32	37	Heading to paragraph 30	<i>Delete <del>Key sites</del> substitute <b>Site Opportunity Locations</b></i>	S
33	38	4.34	<i>Delete first sentence</i>	S
34	40	After 4.44	<i>Insert new heading and paragraph;</i> <b><u>Cross Borough Working</u></b>  <u>The Council is committed to cross boundary working with neighbouring authorities on growth to deliver the growth aspirations of this strategy. In planning strategically for housing, employment and infrastructure provision in the borough, the Council recognises the need to work closely with neighbouring local authorities to ensure a coordinated approach. This is particularly important to achieve synergy with neighbouring regeneration projects including Central Leaside, Stratford City, Olympic Legacy, Thames Gateway and Lea Valley Regional Park proposals</u>	M
35	41	Figure 7	<i>Amend Key diagram as follows;</i>	S

36	42	5.1	<p><i>After second sentence, add;</i>  <u>However the Council also recognises the need to achieve housing growth sustainably. Accordingly this policy must be cross referenced to CS5 (minimising and adapting to climate), CS6 (enhancing green infrastructure and biodiversity) and CS7 (promoting sustainable waste management and recycling).</u></p>	M
37	43	CS2(B) and paragraph 5.40	<p><i>Amend policy CS2(B);</i>                  B) Maximising the number of quality affordable homes in the borough by:</p> <p>i) <u>Aiming to provide at least 50% (5,700 homes) of homes as affordable over the plan period. Of these 60% should be social rented housing and 40% should be intermediate housing. a balance of tenures between social rented, affordable rent and intermediate housing should be provided.</u></p> <p>ii) <u>Assessing the level of affordable housing on a site by site basis. In order to deliver the maximum amount of affordable housing, developments proposing less than 50% will need to demonstrate a viability case, in the form of a viability assessment. Where a viability case is used to justify an</u></p>	S

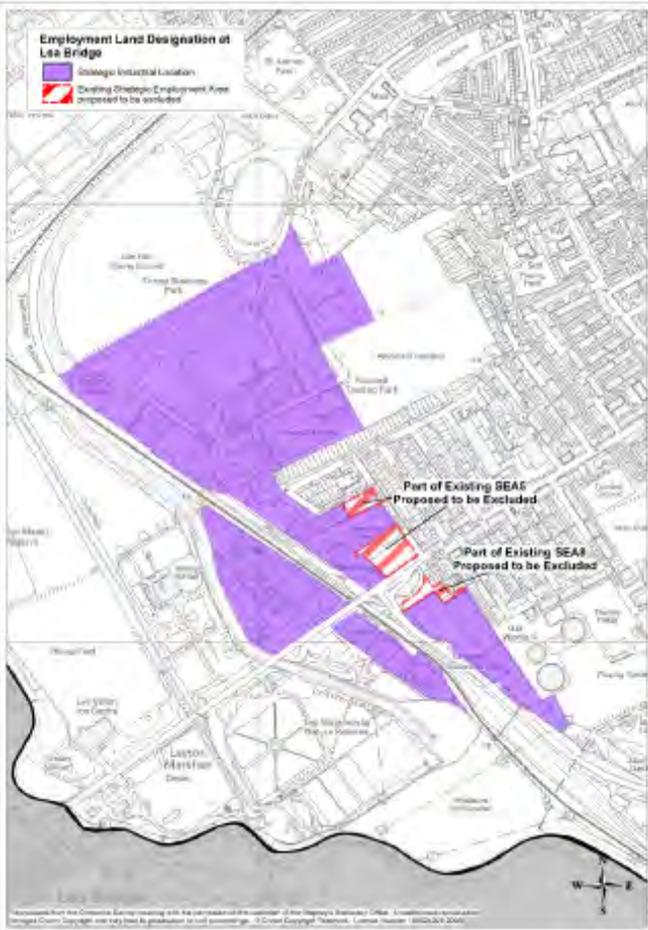
			<p><u>affordable housing offer below policy requirements, the Council will require the shortfall to be treated as a deferred contribution. The Council will then require a subsequent viability assessment to be undertaken when the scheme is completed and largely occupied and should viability have improved, the Council will seek a further payment up to a maximum of the deferred sum.</u></p> <p><i>Consequential amendment to second bullet point of paragraph 5.40:</i> Varying the amount of social rented, <u>affordable rented</u> and intermediate affordable housing</p>																																																																																				
38	43	5.2	<p><i>Add new sentence at start of paragraph;</i> <u>Waltham Forest will make a valuable contribution to increasing housing supply in London</u></p>	M																																																																																			
39	43	5.2	<p><i>Amend last sentence to read;</i> The third component is non - self contained units (such as hostels <u>and student accommodation</u>) which will contribute 45 (an annual target of 3) units.</p>	M																																																																																			
40	44	5.4	<p><i>Amend to read;</i> The SHLAA and HLAA also demonstrate that the Key Growth Areas have significant housing capacity. As shown in table 4, Key Growth Areas will provide a minimum of <del>5,500</del> <u>5,400</u> new homes which accounts for approximately 50% of the borough's total housing capacity. <del>Other key sites, such as Walthamstow Stadium, part of Whipps Cross Hospital and Chingford Municipal Offices have the capacity to provide a minimum of 2,500 homes which is approximately 22% of total capacity.</del> <u>Sites outside of key growth areas will provide a minimum of 5,500 homes which accounts for approximately 50% of the borough's total housing capacity.</u></p>	S																																																																																			
41	44	Table 4	<p><i>Delete table 4, retitle; Estimated housing capacity of Key Growth Areas and other Key sites and substitute (amending title of column 5 to read Totals for large and small sites each AAP/Sites Outside AAP) ;</i></p> <p>Table 4</p> <table border="1"> <thead> <tr> <th>Site</th> <th>2011 – 2016</th> <th>2017 – 21</th> <th>2022 - 2026 and beyond</th> <th>Total for each AAP/Sites Outside AAP</th> <th>Overall Total</th> <th>Potential Supply (up to)</th> </tr> </thead> <tbody> <tr> <td>Blackhorse Lane Large Sites (&lt;0.25ha)</td> <td>700</td> <td>1000</td> <td>150</td> <td>1,850</td> <td rowspan="2">2,000</td> <td rowspan="2">2,500</td> </tr> <tr> <td>Small sites (&gt;0.25ha)</td> <td>50</td> <td>50</td> <td>50</td> <td>150</td> </tr> <tr> <td>Northern Olympic Fringe Large Sites (&lt;0.25ha)</td> <td>70</td> <td>200</td> <td>500</td> <td>770</td> <td rowspan="2">800</td> <td rowspan="2">2,500</td> </tr> <tr> <td>Small Sites (&gt;0.25ha)</td> <td>10</td> <td>10</td> <td>10</td> <td>30</td> </tr> <tr> <td>Walthamstow Town Centre large sites (&lt;0.25ha)</td> <td>800</td> <td>500</td> <td>600</td> <td>1,900</td> <td rowspan="2">2,000</td> <td rowspan="2">2,000</td> </tr> <tr> <td>Small Sites (&gt;0.25ha)</td> <td>40</td> <td>40</td> <td>20</td> <td>100</td> </tr> <tr> <td>Wood Street large sites (&lt;0.25ha)</td> <td>70</td> <td>400</td> <td>70</td> <td>540</td> <td rowspan="2">600</td> <td rowspan="2">1,000</td> </tr> <tr> <td>Small Sites (&gt;0.25ha)</td> <td>20</td> <td>20</td> <td>20</td> <td>60</td> </tr> <tr> <td><b>Key Growth Area Total</b></td> <td></td> <td></td> <td></td> <td></td> <td><b>5,400</b></td> <td><b>8,000</b></td> </tr> <tr> <td>Large sites outside AAPs (&gt;0.25ha)</td> <td>1500</td> <td>1000</td> <td>1500</td> <td>4,000</td> <td>5,500</td> <td>5,500</td> </tr> <tr> <td>Small sites (&lt;0.25ha)</td> <td>400</td> <td>400</td> <td>700</td> <td>1,500</td> <td></td> <td></td> </tr> <tr> <td><b>Total</b></td> <td><b>3,660</b></td> <td><b>3,620</b></td> <td><b>3,620</b></td> <td></td> <td><b>10,900</b></td> <td><b>13,500</b></td> </tr> </tbody> </table>	Site	2011 – 2016	2017 – 21	2022 - 2026 and beyond	Total for each AAP/Sites Outside AAP	Overall Total	Potential Supply (up to)	Blackhorse Lane Large Sites (<0.25ha)	700	1000	150	1,850	2,000	2,500	Small sites (>0.25ha)	50	50	50	150	Northern Olympic Fringe Large Sites (<0.25ha)	70	200	500	770	800	2,500	Small Sites (>0.25ha)	10	10	10	30	Walthamstow Town Centre large sites (<0.25ha)	800	500	600	1,900	2,000	2,000	Small Sites (>0.25ha)	40	40	20	100	Wood Street large sites (<0.25ha)	70	400	70	540	600	1,000	Small Sites (>0.25ha)	20	20	20	60	<b>Key Growth Area Total</b>					<b>5,400</b>	<b>8,000</b>	Large sites outside AAPs (>0.25ha)	1500	1000	1500	4,000	5,500	5,500	Small sites (<0.25ha)	400	400	700	1,500			<b>Total</b>	<b>3,660</b>	<b>3,620</b>	<b>3,620</b>		<b>10,900</b>	<b>13,500</b>	S
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42	44	5.5	<p><i>Amend to read;</i> The Council estimates that the key growth areas of Wood Street, <del>and the Northern Olympic Fringe and Blackhorse Lane</del> have the potential to increase the level of housing provision. Intensifying residential uses, building at higher densities and</p>	M																																																																																			

			incorporating residential uses as part of mixed use development will provide opportunities for increasing supply of new homes in these locations. Such opportunities will be explored through the development of Area Action Plans which will be prepared for these growth areas. <del>A detailed analysis of housing provision has already been undertaken for Walthamstow Town Centre and Blackhorse Lane and thus the reason why there is little projected change to supply.</del>	
43	46	After 5.9	<i>Insert new paragraph;</i> <u>In general, mixed use development should include an element of housing. However, a housing element is not always appropriate to include as part of a mixed use development. For example, housing is not always compatible with industrial uses due to noise and general disturbance. Likewise, in accordance with PPS 25 – Development and Flood Risk (2010) housing is not considered appropriate on flood zone 3b and therefore would not be considered to be appropriate as part of a mixed use development in this location.</u>	S
44	46	5.10	<i>Delete paragraph 5.10 and substitute;</i> <u>Given the urban nature of large parts of the borough it is essential to make the most effective and efficient use of land in order to maximise housing supply. As a general rule, the Council will seek to optimise housing densities across the borough. However, there are locations in the borough, which have high levels of public transport accessibility and which are close to local shops and services, such as town centres, where higher density housing development maybe be appropriate. As the High Density Housing Qualitative Study (2009) highlighted, there is the need for higher density development to address the build and design quality of the development, particularly in terms of functional design, durability and character. Homes should be spacious enough for daily activities with storage and appropriate levels of private amenity space. Further policy guidance will be provided in the Development Management DPD</u>	S
45	46	After 5.11	<i>Insert additional paragraph;</i> <u>The net loss of residential accommodation is justified where a) smaller units are combined to create a larger home(s) b) where residential use is no longer compatible with the surrounding environment c) an overriding need for an alternative use can be demonstrated and d) a loss of housing is necessary to ensure better quality homes and facilitate housing regeneration. Therefore, other than when the above criteria apply, the net loss of housing is unjustified. Further policy guidance will be provided in the Development Management DPD.</u>	S
46	46	5.12	<i>Amend to read;</i> Affordable housing is essentially housing which meets the needs of households whose incomes are not sufficient to enable them to be able to buy or rent housing on the open market. Affordable housing includes Social rented housing, <u>Affordable rented housing</u> <del>Shared ownership</del> and Intermediate <del>rented</del> <u>affordable</u> housing. Social rented housing includes housing rented from the Council and or registered social landlords (RSL) <u>and which are subject to the national rent regime.</u> <u>Affordable rent housing is not subject to the national rent regime but is subject to other rent controls that require a rent of no more than 80 per cent of the local market rent.</u> The	M

			rents on these properties therefore need to be significantly lower than market housing rents. Intermediate <u>affordable</u> housing aims to bridge the gap between social rented housing and market housing. Intermediate housing costs more than social rented housing but should still cost much <del>lower</del> <u>less</u> than market housing. <u>Intermediate affordable housing includes shared equity products, other low cost homes for sale and intermediate rent.</u> The Council will aim to provide a balance of housing tenures in new development. The Development Management DPD will set out the specific tenure mix which new development should seek to achieve.	
47	47	5.15 and 5.16	<i>Add to paragraph 5.15;</i> <u>Further guidance on how policy CS2(B) will be implemented will be produced.</u> <i>Delete paragraph 5.16</i>	S
48	47	5.18 and 5.19	<i>Delete paragraphs 5.18 and 5.19</i>	M
49	49	5.25	<i>Delete paragraph 5.25 and substitute;</i> <u>The Council recognises the important role housing such as Houses in Multiple Occupation (HMO) play in providing low cost and flexible housing options in the borough. However, in recent years dwelling conversions into both self-contained flats and HMOs have taken place at an increasing rate, causing an over concentration of flat conversions and HMOs in certain areas in the south and central of the borough. The over concentration of such housing has caused a number of detrimental effects on the character and amenity of these areas such as added pressure on off street parking and local services. These conversions have also resulted in a loss of larger homes and an increase in the number of smaller homes contributing to the imbalance in the housing stock towards smaller homes and so the Council will resist the conversion of larger homes into smaller flats and other non self contained housing such as Houses in Multiple Occupation. The Council will also support the de-conversion of previously converted homes in order to reinstate them back into larger homes.</u>	M
50	51	5.30	<i>Amend as follows;</i> The spaces between and around buildings are as important as the spaces within. <del>Design</del> <u>High quality design</u> is not just about the buildings or a particular architectural style, but creating <del>places</del> <u>homes</u> that work well from a broader urban design perspective and contribute to improving the urban environment in the borough. <del>Developments should enhance the character and legibility of an area, integrate and connect with the wider public realm network and wherever appropriate, provide opportunities for access to open and green space.</del>	S
51	51	5.31	<i>Amend as follows;</i> <u>It is important The Council will seek to ensure that all new housing in the borough is accessible to all members of the community and is adaptable to the changing needs of residents throughout their lifetime. Housing development(s) which consider inclusive design and accessibility issues at an early stage of and throughout the development process are the most successful at achieving this. In accordance with the draft replacement London Plan (2009), inclusive design and accessibility must be required at every stage of the development process. New development will be required to</u>	S

			<del>meet Lifetime Homes standards and provide a percentage of wheelchair accessible homes (or which can be easily adapted).</del>	
52	52	5.38	<p><i>Amend as follows;</i></p> <p><u>In accordance with Government Circular 01/2006 – Planning for Gypsies and Traveller sites (2006) requires the Council will identify land to provide for the accommodation needs of Gypsy and Travellers. At present one site There is currently one Gypsy and Travellers site in the borough, which has 17 pitches and the a capacity for up to 34 caravans is located in the borough. The Council will continue to protect this site and refurbish where necessary. In order to meet the need identified in The London Gypsy and Traveller Accommodation Needs Assessment (GTANA) (2008), the Council will aim to provide a minimum of 3 pitches up to 2017. Additional need beyond this period will be considered. Potential new sites will be identified in the Site Specific Allocation Document. New sites should a) be suitable for housing b) have access from the public highway, adequate parking provision and turning c) provide basic amenities, water and sewage d) not cause harm to/or the loss of designated Metropolitan Open Land, Green Belt and Sites of Nature Conservation Importance e) limited the harm to visual amenity f) be well integrated with surrounding communities and g) not be located on flood zones</u></p> <p><u>3. identify where there is a requirement for additional pitches in the borough, taking into consideration the existing supply of pitches and the level of provision in the wider sub region. Where need can be demonstrated, additional sites will be identified in future Development Plan Documents that include site allocations such as Area Action Plans and the Site Specific Allocations document. The Council will work in close partnership with developers, Registered Social Landlords and neighbouring local authorities in order to meet identified additional need. Any proposals for additional provision will involve extensive community consultation.</u></p>	S
53	56	CS3(C)	<i>Amend first sentence; major significant</i> new office developments (i.e. those employing 50 people or more)	S
54	57	CS3	<i>Add after subsection (F); To maximise employment opportunities available to local people, Policy CS10 will also be a key consideration</i>	S
55	57	6.7	<i>Insert after first sentence; The emerging Olympic Legacy Supplementary Planning Guidance (OLSPG) will also reconcile industrial provision at a strategic level across this area. Amend second sentence; These SILS</i>	M
56	60	Figure 11	<i>Delete and substitute;</i>	M

57	61	Figure 12	<i>Delete and substitute;</i>	M

				
58	68	7.2	<i>After first sentence add; <u>The provision of transport infrastructure is covered in more detail in Policy CS8 (Developing Sustainable Transport).</u></i>	S
59	68	7.2	<i>Additional bullet point; <u>Courts</u></i>	M
60	68	7.2	<i>After bullet points add; <u>This policy refers to the provision of appropriate infrastructure as stated in policies CS1(F), CS5(E), CS7(B), CS7(D), CS8, CS9 and CS10.</u></i>	S
61	68	7.3	<i>Delete fourth bullet point</i>	M
62	69	CS4	<i>Amend first line; housing and <u>economic</u> growth</i>	M
63	69	CS4(A)	<i>Amend as follows; <u>Resisting the loss of and promoting the enhancement of existing social infrastructure facilities and, except where justified by other Core Strategy policies, resisting its unsubstituted loss where population growth and change requires its provision; where population change reduces demand, managing its loss by reference to the quality of community facility provided, its ability to meet modern requirements (such as soundproofing, disabled access and external smoking areas) and other criteria set out in the Development Management DPD, such as the incidence of recorded crime associated with the premises.</u></i>	S
64	69	CS4(D)	<i>Delete <u>appropriately</u></i>	S
65	69	CS4(E)	<i>Amend as follows; requiring new developments to contribute towards the provision of social <u>and other necessary</u> infrastructure with contributions being either on-site, <del>or</del> through planning contributions <u>or through any applicable Community</u></i>	M

			<u>Infrastructure Levy</u> ; and	
66	69	CS4(F)	<del>Delete appropriate</del>	S
67	72	7.21	<del>Amend as follows;</del> Utilities, waste management facilities and emergency services are essential for development to go forward and for communities to adapt to a growing population. <del>However strategic planning for their delivery can prove challenging. The primary if obvious reason for this is that local planning authorities are not directly in charge of planning for the provision of utilities and physical infrastructure. Utility providers are private companies that operate in a private market, albeit heavily regulated to ensure that the incentives to under provision are minimised, where they contact arrangements directly with their end users. The Development Management Policies Document contains details of</del> <u>Infrastructure provision. Policy DM18 states that the Council will seek appropriate infrastructure provision regarding new development or schemes that create additional demand for infrastructure to make an appropriate contribution to the provision. Details of the criteria for the location of telecommunications development are also covered in DM18.</u>	S
68	72	7.22	<del>Add;</del> <u>The Council will work with energy service providers to facilitate new energy infrastructure within the borough, in particular energy efficient systems such as decentralised energy systems in accordance with policy CS5.</u>	S
69	73	7.24	<del>Amend first two sentences as follows;</del> <u>The Infrastructure Delivery Plan at Appendix 1 Table 8 of this document includes details of infrastructure provision for the borough. Further details in terms of identifying appropriate sites for new infrastructure this will largely be through Area Action Plans and Site Specific Allocations DPDs.</u>	S
70	75	CS5(C)	<del>Amend in first line;</del> <u>encouraging and where appropriate requiring retrofitting</u>	S
71	75	CS5(E)	<del>Amend as follows;</del> working with partners and developers to promote and facilitate the delivery of local decentralised energy capacity and networks <u>that are flexible and adaptable</u> , especially district heating systems in appropriate areas of the Borough, in particular in the key growth areas.	S
72	75	After CS5(E)	<del>Insert additional sub-clause (F) and redesignate subsequent sub-clauses;</del> <u>F) requiring developers to investigate opportunities for establishing or linking into existing or proposed decentralised energy networks through tools such as the London Heat Map;</u>	S
73	75	CS5(F)	<del>Delete in appropriate locations</del>	S
74	75	CS5(H)	<del>Amend as follows;</del> directing development away from areas at high risk from flooding <u>as indicated in figure 15</u> and aiming to achieve an overall reduction in flood risk; requiring sequential and exception test and flood risk assessments (FRAs) in accordance with requirements set out in PPS25; and	S
75	76	8.12	<del>Amend as follows;</del> <u>The Council will seek new developments to be laid out and</u>	S

			<p><del>designed to minimise energy demand during both construction and occupation and will require developments to achieve high feasible environmental standards. This includes consideration of the development's internal heating, cooling, lighting and power appliances. Climate change is a cross-cutting issue and in order to address this holistically, the Council will need to consider sustainability issues beyond the requirements of energy use and carbon reduction. The Council therefore anticipates that new developments achieve high standards of sustainable design across the range of sustainability criteria, including energy/carbon emissions, water, materials, surface water runoff, waste, pollution, health and well-being, management and ecology. The Building Research Establishment's Environmental Assessment Method (BREEAM) and the Code for Sustainable Homes provide helpful assessment tools in the overall sustainability of a development. They include consideration of the development's internal heating, cooling, lighting, and power appliances. Required carbon reduction targets and environmental standards such as (Code for Sustainable Homes and BREEAM standards) are provided in the Development Management Policies DPD. Further guidance on these tools and on measures that contribute towards achieving the policy requirements of CS4 are provided in Waltham Forest's Development Management Policies and the Council's Supplementary Planning Document on Sustainability and Climate Change.</del></p>	
76	77	8.13	<p><i>Insert after fourth sentence;</i>  <u>Where applications for significant extensions and conversions are made, which are an intensification of the use and are expected to have a high increase in energy demand, the Council may require retrofitting measures to be carried out on the existing building. Further detail on these requirements is provided in the Development Management DPD.</u></p>	S
77	77	8.13	<p><i>Add to final sentence;</i>  <u>in accordance with the requirements of PPS5, Policy HE1, and Policy CS15.</u></p>	M
78	77	8.16	<p><i>In third line, insert;</i> <u>liaise with neighbouring authorities, stakeholders</u></p>	M
79	77	8.17	<p><i>Delete last sentence</i></p>	S
80	77	8.17	<p><i>Add after last sentence;</i>  <u>As part of the delivery of a decentralised energy network within the Borough, the Council will seek to facilitate improvements to existing decentralised energy and CHP systems and their connection to a wider network where appropriate.</u></p>	M
81	77	After 8.17	<p><i>Insert additional paragraph;</i>  <u>Opportunities for decentralised energy networks in Waltham Forest can be identified through the use of the London Heat Map, which is an interactive tool developed by the LDA/GLA. Developers will be required to investigate opportunities for connecting to decentralised energy networks by analysing the London Heat Map and in accordance with the requirements set out in the Development Management DPD. As part of the delivery of a decentralised energy network within the Borough, the Council will seek to facilitate improvements to existing</u></p>	S

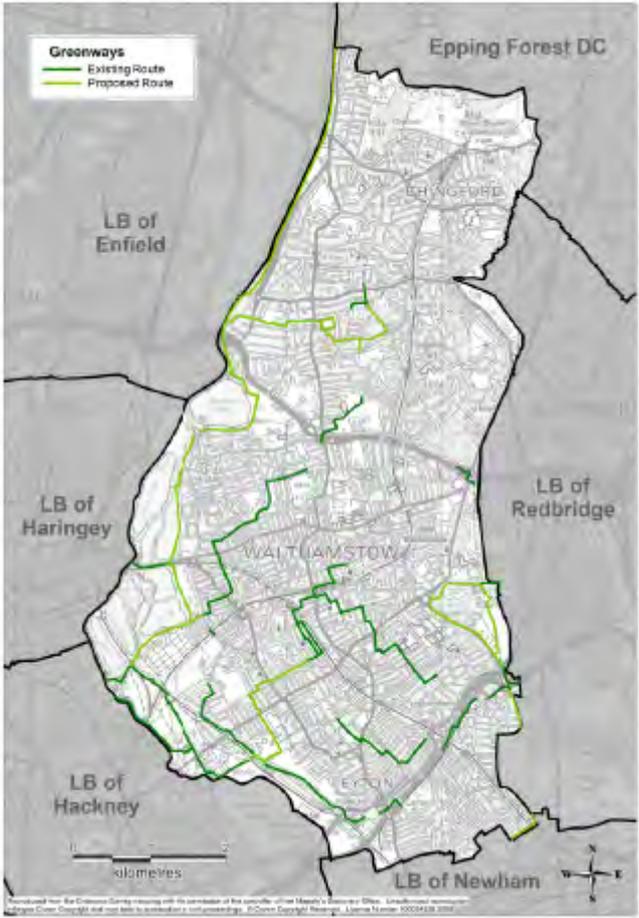
			<u>decentralised energy and CHP systems and their connection to a wider network where appropriate.</u>	
82	78	8.18	<i>Delete paragraph 8.18</i>	M
83	78	8.21	<i>Delete paragraph 8.21</i>	S
84	79	8.25	<i>In last line, delete <del>appropriate and add;</del> such a network can be demonstrated feasible in accordance with the requirements set out in the Development Management DPD. Opportunities to generate energy from waste will be encouraged; policies within the Council's DPDs, in particular the Development Management DPD and the North London Waste Plan, will need to be met.</i>	S
85	79	8.28	<i>Add to start of paragraph; In pursuit of policies CS5(G) and (H).</i>	S
86	79	8.28	<i>Insert after first sentence; The Development Management DPD will provide criteria for the application of this policy.</i>	S
87	80	8.30	<i>Additional sentence at end of paragraph; The Council has carried out a Sequential Test for the key growth areas in house.</i>	M
88	80	8.33	<i>Add to start of paragraph; The Council will work with neighbouring Local Authorities and the Environmental Agency to address flood risk in a coordinated and strategic manner.</i>	M
89	82	8.36	<i>Delete paragraph 8.36</i>	S
90	83	Policy CS6	<i>Delete title and substitute;</i> <b>Enhancing Green Infrastructure and Biodiversity</b>	M
91	83	Policy CS6(B)	<i>Amend as follows;</i> enhancing the green infrastructure network through <u>better connectivity and the creation and enhancement of new open spaces</u>	S
92	83	Policy CS6(B)	<i>Add; whilst also conserving their historic value</i>	M
93	84	CS6	<i>Insert additional sub-clause (F) and redesignate subsequent clauses;</i> <u>improving and increasing the provision of burial space</u>	S
94	84	CS6(F)	<i>Insert after Lee Valley Regional Park and Epping Forest</i>	M
95	84	CS6(G)	<i>Add; and supporting the aims of the London Rivers Action Plan (LRAP)</i>	S
96	84	CS6(K)	<i>Amend as follows;</i> Local Nature Reserves should be maintained; and <del>where it is appropriate</del> further reserves should be designated <u>as documented in the Waltham Forest Biodiversity Action Plan</u>	S
97	84	CS6(L)	<i>Amend as follows;</i> protecting existing healthy trees and encouraging the planting of new trees <del>where appropriate</del> <u>as informed by the Waltham Forest Tree Strategy.</u>	S
98	84	CS6(M)	<i>Amend as follows;</i> ensuring the adequate provision and quality of play and recreational spaces, outdoor sports facilities and parks <u>for all sections and age groups of the community.</u> Where new open spaces are provided they will be designated as appropriate	S
99	84	CS6	<i>Insert additional sub clause;</i> <u>protecting and enhancing the existing level of provision of playing pitches with any future review undertaken in accordance with the Playing Pitch Strategy (2011)</u>	S

100	84	9.3	<p><i>Add to end of paragraph;</i>  <u>The Council will work with the Lee Valley Regional Park Authority and the Epping Forest Conservators to enhance the green links between these two internationally-important sites and to ensure easy and sustainable access opportunities to green spaces across the Borough. This will attract local people and visitors who want to enjoy some of the best green areas and waterways in London. Links between the Borough's parks, the Lea Valley and Epping Forest will be strengthened and enhanced to provide safe green corridors for people and wildlife.</u></p>	M
101	84	After 9.3	<p><i>Additional paragraph;</i>  <u>One way in which the Borough's green infrastructure network can be enhanced is by improving the green links between open spaces. The purpose of this is to provide easy and sustainable access opportunities in order to attract local people and visitors who want to enjoy some of the best green areas and waterways in London. Achieving the aims of the policy will involve examining ways in which links between the Borough's parks, the Lea Valley and Epping Forest can be strengthened and enhanced to provide safe green corridors for people and wildlife. Such work would require partnerships between different organisations, for example with Lee Valley Regional Park Authority and the Epping Forest Conservators."</u></p>	S
102	87	9.7	<p><i>Amend as follows;</i>  The term green infrastructure is used to describe the network of green spaces and other environmental features that are created and managed as a multi-functional resource. The Council aims to improve green infrastructure links in order to support community recreation and biodiversity simultaneously. <u>The historic character and value of open spaces should also be conserved, enhanced and more widely understood. Such historic value can be found in a variety of open spaces which may include cemeteries, parks and waterways that represent the historic evolution of the borough.</u> Green Corridors are accessible routes for people and wildlife and should be created and extended where appropriate. Greenways are the network of mainly off-road routes which connect people and open spaces through links with other non-motorised users such as towpaths and the National Cycle Network. <del>The Council advocates</del> <u>Sustrans promotes</u> the delivery of <del>the</del> Greenways network <del>as put forward by Sustrans to encourage</del> <u>which are beneficial in encouraging</u> more walking and cycling <del>and the creation of green links.</del> There are a number of priority routes which <del>will be supported through the LDF.</del> The routes comprise: Larkwood Park to Lower Hall Lane, Mansfield Park to Woodford Golf Course, Crooked Billet to Lea Valley, and the Valley Road shared use path. <u>The green link between Leyton Mills and Eton Manor will be outlined in the Northern Olympic Fringe Area Action Plan (AAP).</u> An additional priority in <u>implementing the policy is to deliver improvements to</u> <del>These</del> <u>Greenway routes should be strengthened further by improving</u> the links to trip generators, particularly schools. <del>The Council will also encourage</del> Landscaping and environmental improvements adjacent to roads <u>are valuable for</u></p>	S

			<u>strengthening the green infrastructure network as well as providing visual breaks. This is especially important where they pass through areas of environmental significance, such as the Lee Valley Park and Epping Forest.</u>	
103	87	9.8	<i>Amend final sentence as follows;</i> <del>The Council will seek In order to improve and increase the provision of burial space and will work in partnership with other Council departments to do so</del> <u>interdepartmental working within the Council will be required.</u>	S
104	88	Footnote 46	<del>Delete Draft</del>	M
105	89	Footnote 47	<del>Delete Draft</del>	M
106	89	Footnote 49	<del>Delete Draft</del>	M
107	91	9.13	<i>Amend fifth sentence as follows;</i> <del>In order to lessen the pressure on Epping Forest and the Lee Valley SPA and Ramsar sites it is recommended</del> <u>Recommendations arise from the Core Strategy's Sustainability Appraisal and its Habitat Regulations Assessment that alternative open spaces are provided for recreational users, such as walkers and cyclists, in order to relieve pressure on Epping Forest SAC/SSSI and the Lee Valley SPA and Ramsar sites. These recommendations provide additional justification for the open space provision and improvements proposed.'</u>	S
108	91	9.14	<i>After first sentence, insert;</i> <u>This figure does not include the temporary use of allotments at Marsh Lane</u>	M
109	91	Heading to 9.15	<i>Amend as follows;</i> <b>Epping Forest and the Lee Valley Regional Park</b>	M
110	91	9.15	<i>Amend as follows;</i> <del>The Borough is bounded to the northeast and east by Epping Forest and to the west by the Lee Valley Regional Park. The Council is a Competent Authority under the Habitats Regulations 2010 and has the responsibility to enhance biodiversity. Epping Forest contains internationally (SAC) and nationally-important (SSSI) habitats and other open spaces of regional and local importance. It is dominated by ancient woodlands, including very special and characteristic ancient pollarded trees, extensive grass heaths and grasslands, heaths, greenlanes and waterbodies. This constitutes the Borough's most significant open space at 430 hectares, making up 11% of the whole Borough's area and over one third (36%) of the Borough's open spaces and playing fields. Epping Forest also presents opportunities for learning, play and volunteering with rich wildlife, ancient history and completely open access. The Forest, through its free and open access running the whole length of the Borough, and with such a wide variety of habitats and open spaces, has potential to alleviate inequality, particularly to outdoor recreation and education from the boating lake on Hollow Ponds in the south of the Borough to the Queen Elizabeth's Hunting Lodge in the north. At the Queen Eliazabeth's Hunting Lodge a new visitor facility and education centre will be established which will enhance the accessibility of the Forest and a greater number</del>	S

			<p>of visitors in the future. <u>New trails and walks are additionally being promoted to make the Forest easier to explore on foot, by bike and by horse.</u> Improvements to facilities in Epping Forest should be carefully designed and located in order to preserve the character and biodiversity value.</p> <p><i>Insert new sub heading; <b>The Lee Valley Regional Park</b></i></p> <p><i>renumber remainder of paragraph and amend as follows;</i>  The Lee Valley Regional Park is a distinctive statutory asset within Waltham Forest and involves a vast area of open land with reservoirs, meadows and marshes. The Lee Valley Regional Park should be protected, promoted and enhanced in line with its statutory purpose. The Lee Valley offers opportunities for learning and volunteering due to the rich heritage of the area as well as being a valuable resource for leisure, recreation, sport and nature conservation. The Regional Park has the potential to alleviate inequalities and provide opportunities for the community to access nature and the waterside environment. Consequently, the Council supports the facilities that the Regional Park currently provides as well as the future Olympic legacy facilities at Eton Manor, the Velopark and the proposed new green link between Leyton Mill and Eton Manor. The Council will support and work in unison with the Lee Valley Regional Park in order to deliver the Park <u>Plan 2000 and the Park Development Framework.</u> <u>The Council supports the overall aims of the Park Development Framework which seek to protect and enhance the biodiversity, sporting and recreation resources of the Lee Valley Regional Park.</u> <u>The emerging Area Action Plans for the Northern Olympic Fringe and Blackhorse Lane areas cover parts of the Lee Valley Regional Park within Waltham Forest.</u> Accordingly, these plan documents provide the opportunity for taking forward any emerging proposals from the <u>Park Development Framework</u></p>	
111	91	Footnote 50	<del>Delete Draft</del>	M
112	91	Footnote 52	<del>Amend; Park Act 1996</del> <u>1966</u>	M
113	92	9.16	<p><i>Amend final sentence as follows;</i>  <del>The Council will support the aims of the Action Plan for providing</del> <u>When interpreting the policy, the use of the LRAP will be valuable to ensure that there are public green areas where the local community can relax and unwind, as well as green routes for both wildlife and people.</u></p>	S
114	92	9.17	<p><i>Amend fourth sentence as follows;</i>  <del>Development proposals should demonstrate sensitivity to the water environment and measures to enhance biodiversity and water quality should be delivered through</del> <u>is sensitive and it is critical that this is reflected in design of development.</u>  Development proposals and restoration schemes <u>will be a key driver in the delivery of biodiversity and water quality enhancements.</u></p>	S
115	92	9.18	<p><i>Before final sentence insert;</i>  <u>Epping Forest is also an important resource for waterways and waterbodies and encompasses the River Ching and the Hollow Ponds which provides a potential linking open space with health benefits for the patients at Whipps Cross Hospital.</u></p>	M

116	92	After 9.24	<p><i>Insert new figures;</i></p>	S
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117	96	9.27	<p><i>Amend final sentence as follows;</i>  <del>The Council will also support and cultivate the provision of innovative opportunities for sport and recreation for all. In implementing the policy it will be crucial to consider the specific needs of different sections and age groups of the community in order to deliver innovative opportunities for sport and recreation.</del></p>	S
118	96	9.29	<p><i>Amend second and third sentences as follows;</i>  <del>The Council will support the aims of The Open Spaces Strategy identifies ways of reducing to eradicate barriers to using the use of parks, for instance for people with disabilities and to provide new smaller parks in areas recognised as deficient. The Council will also seek to protect and enhance the Certain parks across the Borough are classified as Parks and Gardens of Local Historic Interest as well as those or included in the Local List. Policies for the protection and enhancement of these parks will be outlined in the Development Management Policies DPD.</del></p>	S
119	96	9.30	<p><i>Amend as follows;</i>  <del>Outdoor sports facilities include playing pitches and athletics tracks. The Strategic Infrastructure Plan concludes that there are no strategic infrastructure requirements for outdoor sports facilities arising over the Core Strategy period 2006-2026. The Council is currently updating the Playing Pitch Strategy which was undertaken in 2004. One of the components of the update will involve the analysis of the effect of the Olympic legacy facilities on demand for playing pitches. Once complete, the revised Playing Pitch Strategy will provide valuable information on the use of pitches across the</del></p>	M

			<del>Borough and will guide the implementation of this policy along with the Development Management policies. The update of the Playing Pitch Strategy (2011) provides an analysis of the provision of playing pitches in the Borough. The Strategy found that the projected increase in population will not be a major influence on increases in sports participation; but that the main driver will be increases in the current rate of sports participation by the existing core resident population. It was also noted that there is a strong market for pitch sports. However, there is a shortfall in playing pitch provision for football, cricket, and rugby across the borough and in each of the sub areas, particularly in the south where there is suppressed demand. Due to this shortfall, the Council will look to maintain and protect the existing level of provision and apply the Sport England's 'Playing Fields of England: Policy on Planning Applications for Development on Playing Fields' (1997) during any review. The Playing Pitch Strategy should be used to determine where enhancement measures towards the improvement of quality and access to playing pitches and ancillary facilities are required. The Strategy should additionally be used to ensure that the creation of new pitches for football, cricket and rugby are an appropriate size. By utilising the Strategy in this way, the Council aims to deliver an adequate supply of pitches and to overcome deficiencies in quantity, quality and accessibility.</del>	
120	96	Footnote 57	<del>Delete Draft</del>	M
121	98	CS7	<del>Amend first sentence as follows: The Council will work in partnership with the North London Waste Authority (NLWA) partner boroughs in order to manage its waste to meet the London Plan apportionments and recycling targets in a sustainable manner by:</del>	M
122	101	10.14	<del>Amend final sentence as follows: To ensure an integrated approach to waste management and ensure the highest possible re-use and recycling rates the Council will in accordance with national regulations require, through a planning condition, the submission of a site waste management plan prior to construction for developments worth £300,000 and more.</del>	S
123	103	CS8(C)	<del>Amend as follows: guiding developments to be located town centres and to areas that are well accessible by public transport, including our key growth areas, and requiring them to be designed to reduce the need to travel and to encourage walking, cycling and access to public transport;</del>	S
124	103	CS8(D)	<del>Amend as follows: requiring Transport Assessments and Travel Plans where appropriate in support of planning applications to determine potential transport impacts and to demonstrate how the development minimises and mitigates against the expected impacts and working with and encouraging existing high trip generating organisations to prepare a Travel Plan;</del>	S
125	103	CS8(G)	<del>Amend as follows: Fostering road safety and minimising the negative impacts of traffic such as congestion, pollution and noise by managing traffic flow and speed, effectively in accordance with the road hierarchy and implementing public realm and streetscape</del>	S

			improvements including the reallocation of road space <del>where appropriate</del> , in both cases by reference to: the importance of streets for particular modes (within a road hierarchy and a road user hierarchy to be defined in the Development Management DPD); road safety; locations of high pedestrian demand; the need for pedestrian, cycle and public transport infrastructure; regeneration priorities; design parameters such as the extent of carriageway; funding availability and other criteria to be set out in the Development Management DPD.	
126	103	CS8(I)	<i>Amend as follows;</i> managing parking requirements effectively across the borough to <u>minimise the negative impacts of traffic and reducing reliance on car for journeys</u> by <del>providing</del> <u>requiring appropriate</u> car, motorcycle and cycle parking facilities in accordance with the <u>maximum car and minimum cycle parking standards</u> set out in the Development Management policies, managing on street parking, and promoting car free and car-capped developments; and	S
127	104	11.9	<i>Amend second sentence as follows;</i> Given the problems associated with the increase in car ownership and congestion in the borough in recent years, it is imperative to accommodate growth in travel demand in the most sustainable manner <u>and to improve connectivity to key destinations within the borough and beyond, such as Stratford City or the Central Leaside area.</u>	M
128	104	11.9	<i>Amend final sentence as follows;</i> Strategic transport infrastructure improvements are therefore crucial in supporting future growth and regeneration in the borough and the Council will work closely with TfL, <u>neighbouring boroughs,</u> and other partners to ensure adequate capacity of the transport system.	M
129	106	11.17	<i>Add;</i> <u>Further requirements for coordinating land use and transport are set out in the Development Management DPD.</u>	S
130	106	11.18	<i>Add;</i> <u>Further detail is provided in the Development Management Policies DPD.</u>	S
131	107	11.19	<i>Add;</i> <u>The Council has a Business Travel Plan Advisor who works with existing businesses and organisation to encourage sustainable travel with a particular focus on the preparation of Travel Plans. Existing businesses and organisations, and in particular those with a high trip generating potential, are encouraged to work with the Council in developing a travel plan and encouraging sustainable travel.</u>	S
132	107	11.23	<i>Amend as follows;</i> Similarly, improving safety, routes and parking facilities for cyclists will ensure more journeys are undertaken by bike and pressure on the boroughs public transportation system will be eased. The Council will therefore seek to maximise cycle parking across the borough both in new developments and in the public realm, <del>requiring new developments to contribute to and where appropriate provide appropriate cycle links to</del> <u>strategic cycle routes</u> and work with TfL and other partners <u>and developers</u> to improve the cycle infrastructure across the borough, including <u>an improved provision of cycle routes and links to the strategic cycle network as indicated in the LIP and the implementation of the TfL cycle hire scheme. Appropriate</u>	S

			<u>cycle infrastructure requirements should be identified as part of the transport assessment and pre-application discussion process and will be subject to the location, type and quantum of the development and its likely traffic impacts and mitigation requirements. Further details will be provided in the Development Management DPD.</u>	
133	108	11.30	<i>Amend as follows;</i> Waltham Forest's highway network has a hierarchy of roads, with different character and functions. The Core Strategy takes account of transport networks and the road hierarchy as defined in the boroughs emerging <del>Local Implementation Plan</del> and the Development Management Policies. The Council will ensure that traffic flow and speed is managed in accordance with this hierarchy to limit detrimental impacts of traffic on local neighbourhoods.	S
134	108	11.31	<i>Amend as follows;</i> Streets have more functions than catering for vehicular movement. In accordance with national guidance published by the Department for Transport in the Manual for Streets (place and movement status of street), <u>English Heritage's Streets for All</u> and the Mayor's Better Streets guidance, <del>the Council will</del> <u>policy CS8(G) is intended to ensure that a street and indeed the highway network as a whole is considered holistically, with the anticipation so as to find an appropriate balance between the different users they cater for and between the movement and place specific requirements of a street and the network. Where appropriate the Council will seek</u> <u>This policy is designed to re-balance the amenity of the different road users and potentially reallocate road space, in order to foster road safety and minimise the negative effects of traffic such as congestion, pollution, noise and remove the visual and functional dominance of motor vehicles in the street, especially in places with high pedestrian demand.</u>	S
135	109	11.35	<i>Amend third sentence as follows;</i> Parking for new developments will be provided in accordance with the accessibility <u>and existing or proposed on-street parking controls</u> of an area and car-free and car-capped developments will be promoted, with maximum standards applied elsewhere.	S
136	109	11.36	<i>Amend as follows;</i> <u>In order to manage parking effectively, Council will seek the allocation of parking spaces in accordance with the parking hierarchy set out in the Development Management DPD. The Council will seek to give parking priority to residents, then short term parkers (including shoppers), and then finally long term parkers (including commuters).</u> The Council will also promote, where practical, the re-use of under-utilised car parks for other uses more suitable for town centre uses.	S
137	110	11.39	<i>Delete final sentence</i>	S
138	110	11.42	<i>Amend as follows;</i> The Council will seek to protect and enhance the continued provision of existing cab services within the borough. This includes the provision of affordable business space, <u>and</u> <del>S</del> <u>safe</u> pick-up, drop-off and waiting areas for taxis and cabs <del>will be required</del> where this activity is likely to be associated with new development.	S
139	111	11.45	<i>Amend as follows;</i>	S

			Where <del>appropriate</del> <u>significant transport impacts are identified as a result of servicing requirements of a development</u> , the Council will require new developments to prepare DSPs. The Council will expect all developments to include appropriate servicing facilities and to demonstrate that the requirements for servicing both during construction and when in use are satisfied	
140	112	CS9(D)	<i>Amend as follows;</i> requiring new <u>school proposals including extended schools</u> to be developed as community hubs whereby they are accessible to the general public outside school hours; and	S
141	112	CS9(E)	<i>Amend as follows;</i> <del>allocating land for new educational facilities where there is a need</del> <u>safeguarding land in the identified key growth areas of Blackhorse Lane, Northern Olympic Fringe, Walthamstow and Wood Street and at other opportunity locations identified in the Site Specific Allocations Document.</u>	S
142	114	After 12.12	<i>Insert additional paragraph;</i> <u>It is important that educational facilities have access to play areas, playing fields and sporting activities to support the physical, mental and social development of children. In considering this policy, access should be interpreted as provision either on the school site or within a reasonable distance to allow a management strategy/realistic curriculum timetable to meet educational need.</u>	S
143	116	CS10(A)	<i>Amend as follows;</i> Promoting the delivery of additional education and training facilities, <del>in suitable locations, in both new and existing developments</del> <u>either as new development in town or district centres or within established locations or elsewhere in accordance with the Development Management DPD</u>	S
144	116	CS10(B)	<i>Amend as follows;</i> Ensuring provision is made <del>where appropriate in within new Developments for the recruitment</del> <u>to recruit and training of local residents to serve its needs, proportionate to its size</u>	S
145	119	13.12	<i>Add to final sentence;</i> <u>or a local Community Infrastructure Levy</u>	M
146	121	14.2	<i>Additional sentence;</i> <u>The Council's Culture Strategy 2010-2030 therefore considers how best to attract more tourists and visitors to the area for the benefit of our local economy</u>	M
147	121	14.3	<i>Amend fourth bullet point as follows;</i> <del>One of</del> <u>Historically</u> the longest <u>daily</u> street markets in Europe in Walthamstow Town Centre	M
148	122	Figure 22	<i>Amend figure 22 to show the location of Walthamstow Wetlands;</i>	S

			<p>The map displays the Walthamstow Wetlands area, bounded by a red dashed line. Key features include:         <ul style="list-style-type: none"> <li><b>Reservoirs:</b> Banbury Reservoir, Lockwood Reservoirs, Maynard Reservoirs, Walthamstow Reservoirs, and West Warwick Reservoir.</li> <li><b>Activity Clusters:</b> Indicated by pink starburst symbols, located near Tottenham Hale and Blackhorse Road.</li> <li><b>New Valley Routes:</b> Shown as green lines connecting various points.</li> <li><b>New Entry Points:</b> Marked with orange dots.</li> <li><b>Underground Stations:</b> Circles with black outlines, located at Tottenham Hale, Blackhorse Road, and Walthamstow.</li> <li><b>Future Development:</b> Yellow shaded areas.</li> <li><b>Other Landmarks:</b> Tottenham Hale, Seven Sisters, Clapton, Stoke Newington, and Walthamstow town centre.</li> </ul> </p>	
149	123	CS11(B)	<p><i>Amend as follows;</i> encouraging new leisure and cultural developments in Walthamstow town centre, and other locations <u>with transport facilities</u> suited to attracting visitors</p>	S
150	123	CS11(E)	<p><i>Add;</i> <u>including built heritage</u></p>	M
151	125	14.12	<p><i>Add;</i> <u>Where proposals are likely to have an adverse effect on biodiversity, appropriate mitigation will be necessary. Further detail will be provided in the Development Management Policies DPD.</u></p>	S
152	126	CS12	<p><i>Amend as follows;</i> In managing growth and change, the Council will promote the conservation, enhancement and enjoyment of the historic environment by: <del>A) conserving and enhancing the significance of the borough's heritage assets and their settings such as conservation areas, listed buildings, parks and gardens of local historic interest, archaeological priority zones and other buildings and spaces of local historic value by:</del> <del>B) A) keeping under review heritage designations and designating additional areas, buildings and spaces for</del></p>	S

			<p>protection where justified by evidence;          E) <del>B)</del> carrying out, reviewing and implementing Conservation Area Appraisals and management plans;          D) <del>C)</del> promoting heritage-led regeneration and seeking appropriate beneficial uses and improvements to historic buildings, spaces and areas;          E) <del>D)</del> ensuring improved access to historic assets and improved understanding of the borough's history</p>	
153	127	15.3	<p><i>Insert at start;</i>  <u>The borough's heritage assets as currently designated include conservation areas, listed buildings, parks and gardens of local historic interest, archaeological priority zones and other buildings of local historic value.</u></p>	S
154	128	15.10	<p><i>After paragraph 15.10, insert;</i>  <u>This plan includes one Area of Special Character as shown in Figure 23. The Highams Estate was designated by the Council in 1988. Although this is not a statutory designation, the Council recognises that this area has special character in terms of its cohesive design, similarity of plot sizes and scale of buildings.</u></p>	M
155	128	15.11	<p><i>Delete final sentence</i></p>	S
156	128	15.12	<p><i>Amend as follows;</i>          Some of the borough's historic buildings are within the <del>designated centres</del> <u>Key Growth Areas, Town Centres and other locations</u> where regeneration opportunities exist.  <u>Policies in subsidiary plan documents including the AAPs, Site Specific Allocations Document and Supplementary Planning Documents will include site specific policies and proposals to ensure their protection and enhancement.</u> <del>In considering development proposals for properties in these areas, the Council will ensure that the essential character and appearance of the buildings is maintained and enhanced through redevelopment proposals. Proposals which would involve the demolition of, or drastic alterations to, these properties will be resisted. The Council considers that it is important, as far as is practicable, to retain certain individual, or groups of buildings. For example, parts of the High Street E17 have historic buildings of importance to the character of Walthamstow Town Centre.</del></p>	S
157	129	15.13	<p><i>Delete final sentence</i></p>	S
158	129	15.16	<p><i>Amend as follows;</i>  <u>Policy CS12 (D) supports The Council will support</u> heritage focused projects where appropriate. Heritage-led regeneration can have some influence on social issues such as crime, health, education and particularly social capital. Accordingly, heritage-led regeneration will be applied to area based regeneration schemes, single building projects or other regeneration projects based around a historic building</p>	S
159	129	15.17	<p><i>Amend as follows;</i>  <del>In managing changes to the built environment, the</del> <u>The Council considers will ensure</u> that regeneration presents an opportunity for conservation and development to work together. <del>The Council will ensure</del> <u>and</u> that regeneration projects do not ignore the historic environment - including the parks and green spaces, streets, areas and buildings.  <u>Accordingly, This is particularly important</u> where decisions are being made about the future of historic buildings or areas as</p>	S

			part of a regeneration scheme, <del>the Council. This will seek to ensure that normally require a full assessment of their</del> historical, architectural and archaeological significance <del>has been properly assessed.</del>	
160	130	15.19	<i>Amend as follows;</i> With thought and care, historic buildings can usually be made accessible to all members of the community without compromising their character and quality. <del>Accordingly, the Council will support</del> Appropriate initiatives which increase access to historic assets, provide learning opportunities <del>and will maximise the attraction and their potential as of heritage attractions. assets. Where possible, the Council will seek</del> <u>This policy supports opportunities</u> to open up and provide wider public access to all heritage assets.	S
161	130	15.20	<i>Amend as follows;</i> There is much that can be done to promote an increased awareness of Waltham Forest's heritage, <del>for example, The Council will endeavour to promote an increased awareness of the local heritage by means of</del> the identification and signing of buildings and sites of historic interest, the linking of buildings and sites of historic interest by town trails, and the creation and improvement of sign-posted pedestrian routes.	S
162	133	16.3	<i>Amend fourth sentence as follows;</i> According to the Index of Multiple Deprivation (IMD) <del>2004</del> <u>2007</u> , Waltham Forest is ranked <del>47</del> <u>27</u> th most deprived local authority out of the 354 in England.	M
163	134	CS13(A)	<i>Add;</i> <u>and ensuring satisfactory amenity is provided for future and surrounding occupiers.</u>	S
164	135	After 16.5	<i>Insert new headings and text;</i> <b>Air Quality</b>  The planning system has an important role in controlling certain types of development in close proximity to existing sources of pollution. Poor air quality leads to adverse impacts on health and can undermine efforts to increase sustainable modes of travel, such as walking and cycling, which is encouraged under Policy CS8.  The Council's monitoring of air quality found road traffic to be the main source of pollutants of nitrous oxides (NOx particulates PM10), and subsequently the whole borough has been designated as an Air Quality Management Area.  The table below identifies roads where nitrogen dioxide (NO2) and respirable particles (PM10) are particularly high. In accordance with Policy CS13 (A), development proposals likely to have a further detrimental impact on these areas, will be required to undertake a detailed air quality impact assessment, which should include appropriate mitigation measures.	S

Roads where levels of Nitrogen Dioxide (NO <sub>2</sub> ) and respirable particles (PM10) require an Impact Assessment			
(NO <sub>2</sub> )	(PM10)		
A11 High Road Leytonstone E11	A11 High Road Leytonstone E11		
A104 Woodford New Road	A104 Woodford New Road		
A104 Lea Bridge Road E10 & E17	A104 Lea Bridge Road E10 & E17		
A106 Grove Green Road E10	A106 Grove Green Road E10		
A106 Richmond Road E11	A106 Richmond Road E11		
A106 Church Road E10	A106 Church Lane E11		
A106 Ruckholt Road E10	A106 Ruckholt Road E10		
A110 Lea Valley Road E4	A110 Lea Valley Road E4		
A112 Hoe Street E17	A112 Hoe Street E17		
A112 High Road E10	A112 High Road E10		
A406 North Circular Road E17	A406 North Circular Road E17		
A503 Forest Road E17	A503 Forest Road E17		
A1006 Blackhorse Road E17	A1006 Blackhorse Road E17		
A1006 St James's St E17	A1006 St James's St E17		
A1006 Markhouse Road E17	A1006 Markhouse Road E17		
A1006 Church Road E10	A1006 Church Road E10		
	A112 Chingford Road E4		
	A106 Warren Road E10		
	A106 Francis Road E10		
	A114 Whipps Cross Road E11		
	A112 Chingford Mount Road E4		
	A112 Sewardstone Road E4		
<b>Noise</b>			
<p><u>Noise can have a significant effect on the environment and on the quality of life enjoyed by individuals and communities. A common source of environmental noise is transport-related noise. As the Noise Action Plan London Agglomeration (2010) demonstrates, environmental noise in the borough arises from particular major roads (A406 and A12) and railways (Central Line, Liverpool Street to Chingford Line and Gospel Oak Line). Other common sources of noise are from industrial sites and noise from fixed plant or other activities. This could take the form of both ongoing background noise and discrete or repetitive noise events. Policy CS13(A) will be applied to control or mitigate the impact of new noise generating development, and to ensure that noise-sensitive uses are located and designed in such a way that they are protected from existing sources of noise.</u></p>			
<p><u>The application of Policy CS13(A) will also require additional information such as a noise impact assessment. This will address how the development is affected by noise or the development may affect noise and possible attenuation measures. Noise assessments will be used as pro-actively as possible, not just to identify and secure noise protection, but also to influence layout and design. The advice contained in Planning Policy Guidance 24: Planning and Noise, will be an important consideration in achieving satisfactory noise levels in new developments.</u></p>			
<p><u>Flight noise over the borough has been an increasing concern for local residents. The Council is not the enforcing authority in relation to aircraft noise. However, the Council has an active consultative role in influencing decisions on proposals for airport expansion and any changes to existing flights paths, particularly in relation to Stanstead and London City Airports</u></p>			
165	135	16.8	<p><i>Additional sentence;</i> Further guidance on policy CS13 A will be provided</p>
			S

			in the Development Management DPD.	
166	137	16.16	<p><i>Move paragraph 16.16 to follow paragraph 16.17. Insert new heading;</i>  <b><u>Olympic Legacy</u></b></p> <p><i>and add additional text;</i></p> <p><u>The Olympic legacy will provide a unique opportunity to encourage local people to further participate in physical activity. The Council will aim to maximise the benefits of the Olympic legacy in order to encourage greater participation in physical activity which will in turn contribute to improving local people's health and well being.</u></p> <p><u>The Games legacy will include five new major world-class sports venues. Four venues, which include the Olympic Stadium, the Aquatics Centre, Velodrome, BMX tracks and mountain-bike trails will be located in the Olympic Park. A fifth venue, a mixed-use sports facility will be located at Eton Manor which is in the borough. These facilities will not only increase the level of sporting provision within the sub region but also improve the quality of facilities. It is essential that local residents have easy access to these facilities in order to encourage them to use them. The Council will aim to improve links from the borough into the Olympic Park and other associated sports facilities.</u></p>	M
167	140	CS14(C)	<p><i>Amend final sentence as follows;</i>  Having regard to the level of capacity available in these centres, the provision of <del>an appropriate range of retail and other town centre uses</del> <u>main and bulk convenience food shopping and a reasonable range of comparison shopping facilities and other services</u> will be encouraged in these centres;</p>	S
168	141	CS14(E) (iii)	<p><i>Amend as follows;</i>  "encouraging and managing the development of <del>appropriate</del> clusters of complementary evening and night-time economy uses in town centres, <u>avoiding concentrations of uses likely to lead to an increase in crime and disorder</u></p>	S
169	141	CS14(G)	<p><i>Amend as follows;</i>  encouraging housing in <del>appropriate locations in</del> and around town centres as part of mixed use developments <u>on the upper floors of commercial buildings and on sites where a high quality living environment offering good levels of residential amenity, low noise levels, safe streets, personal security etc, can be created without impeding the development of primary town centre uses such as retail and other commercial uses, particularly in the key growth areas of Blackhorse Lane, Northern Olympic Fringe, Walthamstow Town Centre and Wood Street and other site opportunity locations identified in the Site Specific Allocations Document.</u></p>	S
170	141	CS14(I)	<i>Delete where appropriate</i>	S
171	143	17.13	<i>In fourth line, delete should</i>	S
172	143	17.13	<p><i>Amend final sentence as follows;</i>  To create more sustainable development forms, <u>careful management of</u> local retail parades will be <del>carefully managed</del> <u>necessary</u> to encourage the development of an appropriate</p>	S

			grouping of local shops and facilities	
173	144	After 17.14	<i>Insert;</i> <u>The borough's town centres are individually unique with regard to the factors/criteria that will be important in defining the precise limits to primary and secondary frontages. These include: the role and function of the centre, the form and structure of the town centre (whether it compact or elongated), the current health of the centre, the proximity to nearby centres and clusters of town centre uses, the redevelopment potential of key sites, planned regeneration aspirations for the each centre, the location of the main concentration of town centre uses as well as A1 retail uses, the location of any key anchor/pedestrian generating uses/activities, etc.</u>	S
174	145	17.19	<i>At end of first sentence, insert; (Policy CS11)</i>	M
175	145	17.20	<i>Delete third sentence and amend first line of fourth sentence as follows;</i> The <u>Walthamstow Street Market</u> dates from 1885	M
176	146	17.24	<i>Amend penultimate sentence as follows;</i> <u>In support of Policy CS2 (A)(iii), this strategy seeks to plan for and deliver town centre housing proposals will be planned for and delivered in the key growth areas of Blackhorse Lane, Northern Olympic Fringe, Walthamstow Town Centre and Wood Street. Other and other town centre sites will be identified in the Site Allocations Document."</u>	S
177	146	17.25	<i>Amend fourth line as follows;</i> to a myriad of <del>local</del> smaller <u>local</u> initiatives	M
178	146	17.27	<i>Delete paragraph 17.27 and substitute;</i> <u>In implementing Policy CS14, the Council recognises the need for partnership working to deliver good outcomes. Joined up working with key partners will ensure that the wider issues associated with deprivation, social cohesion, health, community safety etc are dealt with, particularly with regard to negative impacts arising from the dominance or proliferation of particular uses such as betting offices. Supplementary Planning Documents will be used to set out the detailed management approach to be applied.</u>	S
179	147	17.28	<i>Amend as follows;</i> This policy will be implemented in conjunction with other policies in the plan, through the determination of planning applications for retail, leisure and community uses etc and the preparation of Development Management Policies DPD, Site Allocations DPD and the <u>Walthamstow Area Action Plans</u> .	M
180	150	CS15(C)	<i>Amend as follows;</i> C) address issues of height and scale sensitively. Subject to detailed analysis of their impact on local <u>and historic context and other key criteria set out in the English Heritage/CABE guidance tall buildings (defined as ten storeys and above (26 metres above natural ground level))</u> may only be appropriate in <del>some limited locations</del> <u>specific sites within the key growth areas of Blackhorse Lane, Northern Olympic Fringe, Walthamstow Town Centre and Wood Street. The Council will work with partners to identify areas sensitive to tall buildings.</u> Appropriate sites will be identified as part of the development of the AAPs. Elsewhere within the borough tall buildings are considered inappropriate.	S

			<p>In some limited circumstances, medium rise, taller buildings (defined as between 5-9 storeys (13 - 23 metres above natural ground level)) may be appropriate both within the growth areas and at other key locations outside of the growth areas, subject to meeting the same criteria above. Appropriate locations for medium-rise buildings outside of the growth areas will be identified in the Site Specific Allocations Document, and could include;</p> <ul style="list-style-type: none"> <li>• "gateway" sites or key entrance points into the borough,</li> <li>• specific locations at key junctions along principal routes,</li> <li>• central areas or key junctions within shopping centres and,</li> <li>• in areas fronting large areas of open space, subject to there being no detrimental impact on openness and visual amenity.</li> </ul>	
181	150	18.6	<p><i>Amend final sentence as follows;</i>  <u>In managing changes to the built environment, it will be important to ensure that development proposals will be expected to give recognition to the unique characteristics of the local context as defined by the combination of the common elements present</u></p>	S
182	151	18.8	<p><i>Delete penultimate sentence and substitute;</i>  <u>In support of Policy CS6(L), integrating the provision of street trees in urban design schemes will reinforce the character and local distinctiveness of the borough.</u></p>	S
183	151	18.9	<p><i>Delete paragraph 18.9 and substitute;</i>  <u>Increasing the density of new development generally has the effect of reducing land and site development costs for developers, letting them spread these costs over a larger number of units, and therefore, reducing purchase prices for homes and rents. Also density increases in town centres and near transport hubs can help reduce traffic congestion by providing more opportunities for residents to live near their jobs. Furthermore higher densities can also result in more efficient use of existing infrastructure capacity.</u></p> <p><u>However higher density development requires greater attention to design (architectural style, landscaping, site coverage, open space, parking, etc.) to enhance aesthetic appeal and to blend in with surrounding developments. Accordingly, it will be necessary for the density of new development to be carefully managed through the design process. As a guide, this strategy seeks to apply the residential density ranges as in the London Plan.</u></p>	S
184	152	Before 18.12	<p><i>Insert additional paragraph;</i>  <u>The built context of Waltham Forest is essentially one of 2-3 storey development and therefore the appropriateness of tall buildings must be managed sensitively against this backdrop. Accordingly, proposals for tall buildings will only be supported in specific locations where there are no harmful implications on their surroundings.</u></p>	S
185	152	Following 18.12	<p><i>Insert additional paragraphs;</i>  <u>There is no absolute definition of what constitutes a tall building, although recent CABE/English Heritage guidance (July 2007) suggests this as being "...relevant to buildings</u></p>	S

		<p><u>which are substantially taller than their neighbours and/or which significantly change the skyline" (para 4.1). This definition is also repeated in the adopted London Plan (July 2011).</u></p> <p><u>The CABE/English Heritage guidance also states that "It is clearly the case that a 10-storey building in a mainly two-storey neighbourhood will be thought of as a tall building by those affected, whereas in the centre of a large city it may not" (para.4.1). The Council considers this a useful working definition, and taking into account the built context of the borough, will adopt the following categories of building heights in providing a practical set of criteria for policy purposes and in clarifying its approach to tall buildings:</u></p> <ul style="list-style-type: none"> <li>• <u>Category 1: Tall buildings – buildings of 10 storeys or more (26 metres above natural ground level (Based on residential floor to ceiling heights of approximately 2.6 metres per floor))</u></li> <li>• <u>Category 2: Medium rise "taller" buildings – buildings between 5 – 9 storeys (13- 23 metres above AOD natural ground level (Based on residential floor to ceiling heights of approximately 2.6 metres per floor))</u></li> </ul> <p><u>Given the built context and character of Waltham Forest, there will be very few locations within the borough where tall buildings (10 storeys and above (height in metres above natural ground level)) will be considered appropriate, and then only in very limited and specific circumstances within the borough's key regeneration areas, subject to satisfying the detailed criteria set out in Policy DM32 and the EH/CABE guidance. Elsewhere within the borough tall buildings are considered inappropriate.</u></p> <p><b><u>Medium rise, taller buildings</u></b></p> <p><u>As regards medium-rise "taller" buildings (Category 2), there may be some limited circumstances both within the key regeneration areas and outside of these areas, where development of this scale may be considered appropriate. In principle, these could for example include, "gateway" sites or key entrance points into the borough, specific locations at key junctions along principal routes, central areas or key junctions within shopping centres and, in areas fronting large areas of open space, subject to there being no detrimental impact on their openness and visual amenity.</u></p> <p><u>However, it is important to note that proposals involving building heights of this scale will require a particularly convincing and robust design case and in many circumstances may still be considered inappropriate.</u></p> <p><u>Fundamentally, all such proposals will need to clearly demonstrate that the criteria set out in the CABE/English Heritage guidance have been fully addressed. In particular proposals will need to:</u></p> <ol style="list-style-type: none"> <li>i) <u>be sensitively related in scale and height to neighbouring buildings,</u></li> <li>ii) <u>contribute to improving and/or reinforcing local character</u></li> </ol>	
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			<p><u>and townscape.</u></p> <p><u>iii) demonstrate no negative impact on established heritage assets and their setting.</u></p> <p><u>iv) enhance the qualities of their immediate and wider setting.</u></p> <p><u>v) be of the highest standards of architecture and design, and</u></p> <p><u>vi) where appropriate, make a significant contribution to local regeneration.</u></p>	
186	152	18.13	<p><i>Amend first line as follows;</i></p> <p>This policy includes a commitment to work with partners to identify <del>particular areas</del> <u>specific sites</u></p>	S
187	152	18.15	<p><i>Amend first two lines as follows;</i></p> <p>In promoting high quality <del>standards</del>, it will be necessary to apply <del>the Building for Life Criteria</del>. <u>This appropriate standards.</u></p> <p><u>The Building for Life Criteria provides a useful guide then as written)</u></p>	S
188	155	CS16(A)	<p><i>Amend as follows;</i></p> <p>minimise opportunities for criminal behaviour by requiring all forms of new development to incorporate the principles <u>and practices</u> of <u>Designing out Crime and Secured by Design</u></p>	M
189	157	19.7	<p><i>Amend third sentence as follows;</i></p> <p>The Council will expect development proposals to reflect the guidance found in <i>Safer Places: The Planning System and Crime Prevention; ODPM; 2004</i>, and <u>the full range of ACPO guidance in Secured by Design; ACPO; 2009.</u></p>	M
190	158	19.15	<p><i>Amend first sentence as follows;</i></p> <p>The Council will ensure that community safety measures are implemented in the borough by ensuring that planning applications for new developments demonstrate how a development will incorporate the principles <u>and practices</u> of 'Secured by Design' and 'Designing out Crime.</p>	M
191	160	After 20.1	<p><i>Insert additional heading and subsequent text;</i></p> <p><b>Quantum of Development</b></p> <p><u>The main elements of growth in these areas relate to housing, retail, and employment. The focus for plan delivery will be the key growth areas as identified. These areas are already well served by public transport and therefore provide the most sustainable locations for promoting housing and economic growth.</u></p> <p><u>Policy CS2 and supporting paragraphs (5.2 - 5.3) set out the growth requirements for delivering housing in the borough. This plan seeks to provide 10,320 new homes during the plan period. Table 4 (as amended) and Appendix B provides information on how this element of growth will be delivered.</u></p> <p><u>With regard to retail, the total floorspace requirement up to the plan period is 76,600 sq m (11,800 convenience and 64,800 comparison). By 2016, there is the need to accommodate about 20,000 sq m net additional retail floorspace. The Council considers that in the short term, the reoccupation of vacant floorspace would help accommodate about 18% of the projected growth.</u></p> <p><u>In accordance with Policy CS14 and the sequential test, town centre sites will be prioritised for delivering this growth. Sites</u></p>	S

have been identified in the emerging AAPs and the Site Specific Allocations Documents to accommodate this level of growth. In the medium to long term, additional opportunities will be explored with landowners and developers. The Waltham Forest Retail and Leisure Study (KE64) recognises that projections are subject to uncertainty and forecasts may need to be amended to reflect changes as and when new information becomes available. Accordingly, the projected floorspace requirements will be updated in 5 yearly periods.

Policy CS3 seeks to ensure a healthy supply of land and premises to secure jobs. The indicative level of growth (24000 sq m of new B1 floorspace) is expected to come from the greater intensification of employment land, particularly through mixed use developments in the key growth areas. Outside the key growth areas there is also some scope for an intensified employment offer, both through the designated Borough Employment Areas identified in Table 6, and also other sites identified in the emerging Site Specific Allocations document.

The table below shows the distribution of growth during the plan period (as indicative figures only). The Council will continue to explore opportunities to deliver growth throughout the plan period. Accordingly plan performance will be monitored annually and the table updated as further site development opportunities continue to be explored through the emerging AAPs and Site Specific Allocations documents.

Growth Area	Housing (number of units) <sup>(15)</sup>				Retail (floorspace m2)				Employment (floorspace m2)			
	Total	0-5 Years	6-10 years	11- 15	Total	0-5 years	6-10 years	11- 15 years	Total	0-5 years	6-10 years	11- 15 years
Blackhorse Lane	2,000 <sup>(16)</sup>	750	1,050	200	3200	2300	500	400	10,000	4600	2400	3000
Northern Olympic Fringe (NOF)	800 <sup>(17)</sup>	80	210	510	2700	1000	1000	700	7500	2500	2500	2500
Walthamstow	2,000 <sup>(18)</sup>	840	540	620	22300	8400	6400	7500	3800	2300	1000	500
Wood Street	600 <sup>(19)</sup>	90	420	90	750	500	-	-	500	200	100	200
Total - Key growth areas	5,400	1,760	2,220	1,420	28700	12200	7900	8600	21800	9600	6000	6200
Other Opportunity Sites	5,500 <sup>(20)</sup>	1,900	1,400	2,200	7000	5000	2000	-	2200	-	-	-
Total	10,900	3,660	3,620	3,620	35700	17200	9900	8600	24,000	9600	6000	6200

<sup>15</sup> Figures included in this table are based on existing SHLAA/HLAA evidence (2009)

<sup>16</sup> An increase in delivery target is proposed (up to 2500 units as potential supply) through the emerging Blackhorse Lane AAP (see Policy CS1 and Table 4)

<sup>17</sup> An increase in delivery target is proposed (up to 2500 units as potential supply) through the emerging NOF AAP (see Policy CS1 and Table 4)

<sup>18</sup> An increase in delivery target is proposed (up to 2000 units as potential supply) through the emerging Walthamstow AAP (see Policy CS1 and Table 4)

<sup>19</sup> An increase in delivery target is proposed (up to 1000 units as potential supply) through the emerging Wood Street AAP (see Policy CS1 and Table 4)

<sup>20</sup> Indicative potential to be delivered through the Site Specific Allocations Document (see Table 4).

The main mechanism for the delivery of the growth aspirations of this strategy will be the Area Action Plans (AAP) and the Site Specific Allocations Document (SSA). These documents will guide the future development and use of land and buildings within the identified key growth areas. These Development Plan Documents (DPDs) in particular will help drive development and regeneration. Specifically they will set out policies to deliver growth, and to stimulate and guide regeneration in the key growth areas by allocating specific sites for proposals.

			<p><u>The estimated adoption of these DPDs is as follows:</u></p> <ul style="list-style-type: none"> <li>• <u>Blackhorse Lane - April 2013</u></li> <li>• <u>Northern Olympic Fringe - October 2012</u></li> <li>• <u>Walthamstow Town Centre - April 2013</u></li> <li>• <u>Wood Street - July 2013</u></li> <li>• <u>Site Specific Allocations - July 2013</u></li> </ul>																																					
192	160	20.5	<p><i>In fourth line, amend as follows;</i>  <u>Olympic Delivery Agency Authority</u></p>	M																																				
193	162	20.16	<p><i>Delete paragraph 20.16</i></p>	S																																				
194	164	After 21.5	<p><i>Insert new appendix;</i>  <b>IMPLEMENTATION AND DELIVERY</b></p> <table border="1"> <thead> <tr> <th>Main elements of Growth</th> <th>Impact/Outcome</th> <th>Key Implementing Agencies</th> <th>Key mechanisms for delivery</th> <th>Funding Source</th> <th>Timing</th> </tr> </thead> <tbody> <tr> <td>Delivering new homes (Policy CS2)</td> <td> <ul style="list-style-type: none"> <li>Increasing the supply of new homes, particularly family homes, in the borough.</li> <li>Maximising the development of affordable housing in the borough.</li> <li>Ensuring the development of an attractive, mixed and balanced community that retains residents, by providing homes of differing sizes, types and tenures that meet local priority need.</li> <li>Efficient and effective use of land.</li> <li>All housing is built to the highest build and design quality.</li> <li>Meeting the needs of Gypsies and Travellers.</li> </ul> </td> <td> <ul style="list-style-type: none"> <li>Private housing developers.</li> <li>Development Management.</li> <li>Affordable housing providers (Registered Social Landlords, Private Sector, Ascham Homes).</li> <li>Homes and Community Agency.</li> <li>Public sector land owners.</li> <li>Local Strategic Partnership.</li> <li>East London Housing Partnership</li> <li>Housing Association Liaison Group (HALG)</li> </ul> </td> <td> <ul style="list-style-type: none"> <li>Draft Replacement London Plan.</li> <li>Mayors Housing Design Guide.</li> <li>London Housing Strategy.</li> <li>Sustainable Community Strategy.</li> <li>Site Specific Allocations Document.</li> <li>Development Management Document.</li> <li>Area Action Plans for Key Growth Areas.</li> <li>Borough Investment Plan.</li> <li>Waltham Forest Housing Strategy 2008 -2028.</li> <li>Housing Renewal Programme.</li> <li>Empty Properties Strategy.</li> <li>Supporting People Strategy.</li> <li>Borough Investment Plan.</li> <li>Homelessness Strategy.</li> </ul> </td> <td> <ul style="list-style-type: none"> <li>Affordable housing contributions from developments through planning obligations.</li> <li>Affordable housing providers.</li> <li>Homes and Communities Agency</li> <li>Social Housing Grant.</li> <li>Local Strategic Partnership.</li> </ul> </td> <td>Throughout the Plan</td> </tr> <tr> <td></td> <td></td> <td> <ul style="list-style-type: none"> <li>Housing and Planning Group</li> <li>'Key growth area' regeneration boards.</li> </ul> </td> <td> <ul style="list-style-type: none"> <li>Pre application discussions</li> <li>Housing Association Liaison Group (HALG)</li> <li>Housing and Planning Group</li> <li>'Key growth area' regeneration boards.</li> </ul> </td> <td></td> <td></td> </tr> <tr> <td>Creating and attracting new jobs (Policy CS3)</td> <td> <ul style="list-style-type: none"> <li>Healthy supply of land for industrial purposes</li> <li>Efficient use of employment land so more people can be employed on less land</li> <li>Provision of new office developments in designated centres and other appropriate locations</li> </ul> </td> <td> <ul style="list-style-type: none"> <li>Waltham Forest Council Development Management;</li> <li>Landowners;</li> <li>Developers;</li> <li>Employment and Enterprise Partnership.</li> </ul> </td> <td> <ul style="list-style-type: none"> <li>Development Management Policy Document;</li> <li>Site Specific Allocations Document;</li> <li>Area Action Plans for the key growth areas; 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	Open Spaces and Parks	New open spaces	Priorities are: Blackhorse Lane and Palmerston Road area and in the area near Essex Road, Walwood Road and Murchison Road. Other locations may be identified throughout the lifetime of the Core Strategy. New spaces in areas deficient in access to open space is a priority.	Waltham Forest Council	Financial and on-site contributions	2011 - 2020
	Greenways	Extension of the Greenways network	Various locations as shown on the Proposals Map	Waltham Forest Council, Sustrans, Transport for London	Local Implementation Plan	2011-2026
	Allotments	Efficient use of existing allotments and promotion of community gardens and living roofs and walls.	Borough-wide but particular need in the south sub-area	Waltham Forest Council	Financial or on-site contributions	2011 - 2026
	Cemeteries	Provision sufficient to 2021. 320-335sqm of burial space required over the remainder of the plan period (representing lower and higher growth scenario).	Currently investigating requirements and potential locations	Waltham Forest Council	Waltham Forest Council, Central Government, Growth Area funding, Big Lottery	2011- 2026
	Waterways	1) Lee Valley Pathway Project 2) Walthamstow Wetlands 3) Revitalisation of Dagenham Brook	1) Western edge of the Borough 2) see Open Spaces and Parks above 3) Dagenham Brook, western side of the Borough	1) Lee Valley Regional Park/LB Waltham Forest/ Thames Water Environment Agency/ landowners 2) see Open Spaces and Parks above 3) Waltham Forest	1) Financial contributions/ Lee Valley Regional Park Authority/ Waltham Forest Council/ Thames Water 2) see Open Spaces and Parks above 3) Financial contributions	1) 2011-2026 2) see Open Spaces and Parks above 3) 2011-2026
	Biodiversity	Creation or Enhancement of Habitats	Current priorities: Hawkwood Pond, British Legion Road Open Space, Pimp Hall Nature Reserve, Mansfield Park, Waltham Way, Ridgeway Park, Chingford Mount	Waltham Forest Council	Waltham Forest Council, financial contributions, grant funding including SITA, BIFFA and Groundwork	2011-2026
			Cemetery, Larkwood and Larkwood Playing Fields, Ainslie Wood Sports Ground, Ainslie Wood, Mallinson Park Woods, Lloyd and Aveling Park, Greenway Avenue Nature Reserve, Low Hall Conservation Area, Low Hall Sports Ground, Marsh Lane Playing Field, St Mary's Churchyard, St John the Baptist's Churchyard			
	Child Play Spaces	Increase in quality and access to child play spaces and MUGAs	Borough-wide but with priorities in areas deficient in access to play space	Waltham Forest Council	Financial and on-site contributions	2011 - 2016
	Playing Pitches	Increase the number of playing pitches and sites to meet identified deficiencies and deliver enhancement works to existing pitches. Requirements for new pitches based on sport and surface type as well as existing pitches and associated facilities to be improved are included in the Action Plan of the Playing Pitch Strategy (2011). This list is extensive and is therefore not duplicated here.	Borough-wide but with sub-area specific requirements as identified in the Playing Pitch Strategy (2011)	Waltham Forest Council	Waltham Forest Council, financial contributions	2011-2020

Core Strategy Policy	Infrastructure Type	Planning Infrastructure Item	Location/Growth	Delivery Lead	Funding	Delivery time scale	
CS7	Waste	Additional waste management facilities and land. Land allocated in the North London Waste Plan.	Across north London boroughs	North London Waste Authority / Developer	North London Waste Authority / Developer	2011 - 2026	
		Inclusion of integrated waste management facilities within new developments	Borough-wide	WalthamForest Council	Private companies e.g. developer of a housing estate	2011 -2026	
CS8	Rail	Crossrail 2. New rail link to provide a faster east to west rail link connecting Euston in Central London with Epping in the east via Leytonstone. Safeguarded route will be re-freshed by TfL in 2013/14	Southern WF	TfL / Network Rail	Funding not yet confirmed.  Likely to include TfL/Network Rail funding and Developer contributions	2031/32	
		Electrification of the Gospel Oak to Barking line, to result in improved passenger service and increased freight capacity and reduction of carbon emissions	Southern WF	TfL / Network Rail	Funding not yet identified.  Likely to include TfL / Department for Transport funding	2018/19	
		Reinstatement of Hall Farm Curve on Chingford to Liverpool Street Line	Borough-wide (in particular areas around Chingford, Highams Park, Wood Street, Walthamstow Central, St James Street)	TfL/ Network rail	Total funding not yet identified.  Likely to include TfL / Network Rail funding and developer contributions	Delivery by 2018/19	
		Reinstatement of LeaBridge railway station on Lea Valley Line	Existing Station in the LeaBridge Area	TfL/ Network rail	Total funding not yet identified.  Likely to include TfL / Network Rail funding and developer contributions	Delivery by 2014-2019	
		London Underground – step free access at Blackhorse Lane station	Blackhorse Lane	TfL	TfL	2017/2018	
		Victoria Line upgrade:  • More trains running during peak hours (rising from 27 to 33 trains an hour)  • Improved ventilation throughout the line by replacing fans at 13 vent shafts  • Better accessibility with dedicated wheelchair spaces and level access at most stations. These improvements will bring faster and more comfortable travel, with journey times reduced by 16 per cent and capacity increased by 21 per cent	Borough-wide, in particular areas around Walthamstow Central and Blackhorse Lane station	TfL	TfL	2012	
		Bus Route 97	Extension of existing bus route 97 from Chingford (via Leyton) to Stratford	Chingford to Stratford	TfL	TfL	2011
		Bus	Ongoing improvements of capacity, accessibility (incl. DDA compliance and Real Time Information) and connectivity, subject to TfL Bus review	Borough-wide	TfL	TfL / developer contributions	2011- 2026
		Road Network	Road Links and Junction Improvements. On-going Maintenance. Local Road Safety Schemes.	Borough-wide	LB Waltham Forest / TfL	TfL (through LIP 2 funding secured until 2013/14) / Developer Contributions	2011 - 2026
		Public Realm Improvements	Public Realm works identified in LIP until 2013/14 to be refreshed after that period. To facilitate pedestrian movement and connectivity.	Borough-wide	LB Waltham Forest	TfL (through LIP 2 funding secured until 2013/14) / Developer contributions	2011 - 2026
Legible London	Through Legible London signage, improve legibility and accessibility for pedestrians and encourage people to walk. To support the borough's wayfinding strategy.	Scheme to be rolled out throughout the Borough in high pedestrian areas such as station areas and town centres within the plan period.	LB Waltham Forest with TfL / Design for London	TfL (through LIP 2 funding secured until 2013/14) / Developer contributions	2011 - 2021		
Cycle Routes	Ongoing improvements to cycle network as identified in the LIP 2. Schemes identified until 2012/14, LIP to be updated after that period	Borough-wide	LB Waltham Forest	TfL (through LIP 2 funding secured until 2013/14) / ODA in east of LBWF / Developer contributions	2011 - 2026		
Cycle Parking	To increase and improve cycle parking facilities.	Borough-wide	LB Waltham Forest	TfL (through LIP 2 funding secured until 2013/14) / Developer contributions	2011 - 2026		
Cycle Superhighways	LBWF exploring opportunities to introduce a cycle superhighway in the borough or, as a minimum, improve linkages to the cycle superhighways in the proximity of the borough	Borough-wide	LB Waltham Forest / TfL	TfL / Developer contributions	2018 - 2026		

Core Strategy Policy	Infrastructure Type	Planning Infrastructure Item	Location/Growth	Delivery Lead	Funding	Delivery time scale
CS9	Primary Education	Expansion of provision of existing primary schools by 9 Forms of Entry  Total of 18.8 Forms of Entry (FoE) to 2026 required under GLA's population projections as follows: - 4.9 FoE - 2009 -2014 - 13.5 FoE 2014 -2019 - 0.4 FoE 2019 - 2026	2 Forms of Entry at Edinburgh primary school, 1 Form of Entry each at Willow Brook, Cann Hall, and Beaumont and Saint Saviour's primary schools. 3 Forms of Entry to be located within area of need (see Figure 20)	Waltham Forest Council and/or other providers	New funding mechanisms to be determined by Department for Education/ Partnership for Schools	On going-throughout plan period.
	Secondary Education	Expansion of provision of existing secondary schools by 7.6 Forms of Entry (FoE)  New Secondary School – 8 Forms of Entry	Potential for 1 FoE each at Higham's Park and Leytonstone and 2 FoE each at Willowfield and Kelmscott Secondary Schools (1.8 forms to be located within area of need (Central to South Waltham Forest- See Figure 20)	Waltham Forest Council and/or other providers	New funding mechanisms to be determined by Department for Education/ Partnership for Schools	On going-throughout plan period
	Further Education	Increased Further Education capacity by 830 places	At Secondary Schools across the Borough	Waltham Forest Council and/or other providers	Growth Area funding, Housing Developer Contributions	2011-2019
CS10	Employment Brokerage	Additional 81sqm of floorspace required based on new population.	Central Waltham Forest	Waltham Forest Council	Central Government, Growth Area funding. Potentially housing developer contributions	2011 - 2026
	Public transport and cycle routes - see CS8					
CS11	Open Spaces and Parks - see CS6 item 3					
CS12	Access to heritage assets	Improved public realm/transport facilities - see Policy CS8	Heritage asset locations - conservation areas/ historic buildings.	Waltham Forest Council	Local Implementation Plan (LIP) Funding	2011- 2016
CS13	Primary Health	Development of consolidated surgeries	Planned for St James Street, Tallack Road, Higham Hill and Handsworth Avenue	Waltham Forest Primary Care Trust	Central Government	2009 -2016
		Development of Polyclinics	6 Broad locations identified – 2 in Chingford, 1 in Walthamstow, 3 in Leyton/Leytonstone	Waltham Forest Primary Care Trust	Central Government	
		Total of 4 additional GP practices required. - 1 GP Practice 2014 -2019 - 2 GP Practice 2019 - 2026	Focus on the Key Growth Areas	Waltham Forest Primary Care Trust	Central Government	
		Dental Health Total of 4 dental practices - 1 dental practice 2014 – 2019 - 3 dental practices 2019 -2026	Focus on the Key Growth Areas	Waltham Forest Primary Care Trust	Growth Area funding / housing developer contributions	2014 - 2026
		Secondary Health Care Demand led potential requirement for: (i) 72 acute beds (ii) 10 intermediate beds (iii) 10 intermediate day spaces	Borough wide	London Strategic Health Authority (SHA)	London SHA/ Waltham Forest PCT / Growth Area funding / housing developer contributions	2009 -2026
CS14	General - relating to the provision of social infrastructure in town centre locations. See Policies CS4, CS8, CS13					
CS15	None - as this policy relates to the design of buildings, places and spaces					
CS16	Public realm - see CS8					

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Appendix 2

Delete and substitute;

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**MONITORING INDICATORS AND TARGETS**

Strategic Objective	Core Strategy Policy	Desired Outcomes	Monitoring Indicators	Main Targets
SO1	CS1 Location and Management of Growth	<ul style="list-style-type: none"> <li>Regeneration activities focused in the identified key growth areas</li> <li>Additional growth in town centre uses directed to the main town centres</li> <li>Opportunity sites developed for appropriate uses including housing, employment, leisure and community uses</li> <li>Local areas protected from inappropriate developments</li> <li>Growth accommodated on previously developed land.</li> <li>Timely delivery of essential infrastructure</li> <li>Implementation mechanisms put in place.</li> </ul>	New indicators to be created: <ul style="list-style-type: none"> <li>Number of regeneration projects/proposals planned for or implemented within and outside the key growth areas</li> <li>Number of main town centre uses located within and outside the designated centres.</li> <li>Number of site specific proposals planned for or implemented at identified opportunity sites</li> <li>Number of planning approvals for major developments within and outside the key growth areas</li> <li>Number of developments on green field sites (Green Belt or MOL) and those on previously developed land</li> <li>Number of infrastructure proposals granted /implemented</li> <li>Number of applications granted or secured through planning obligations</li> </ul>	<ul style="list-style-type: none"> <li>Identification of key sites in the key growth areas.</li> <li>No new town centre proposals granted outside the designated centres</li> <li>Adoption and Implementation of Area Action Plans for four key regeneration areas (Walthamstow Town Centre, Blackhorse Lane, Northern Olympic Fringe and Wood Street).</li> <li>No loss of green belt or MOL land</li> </ul>
			<ul style="list-style-type: none"> <li>Number of Business Improvement Districts established</li> <li>Number of Compulsory purchase schemes undertaken</li> </ul>	
SO2	CS2 Improve Housing Quality and Choice	<ul style="list-style-type: none"> <li>Resist the net loss of residential accommodation.</li> <li>Focusing new homes on previously developed land.</li> <li>Increasing housing supply, particularly in the 'key growth areas'.</li> <li>All new developments with a capacity of 10 or more units to include an element of affordable housing.</li> <li>Protecting and increasing the number of family homes in the borough.</li> <li>Bringing empty properties back into use.</li> <li>Including housing in mixed use development.</li> <li>Supporting housing estates renewal.</li> <li>Make the most efficient and effective use land.</li> </ul>	H1 – Plan period and housing targets. H2(a) – New dwellings built in previous 5 yrs including by dwelling size and tenure. H2(b) (N1154) – New dwellings built (annually) - Including net gain of housing including empty properties returned to use and non self contained units. H2(c) – New dwellings in future years – housing trajectory - including housing built in each 'key growth area'. H2(d) – Managed delivery target. H3 – New dwellings built on previously developed land. H4 – Pitches for Gypsies and Travellers.	Over the plan period: <ul style="list-style-type: none"> <li>Meeting the minimum target of additional homes set by the draft replacement London Plan.</li> <li>Bringing 1035 empty properties back into use.</li> <li>Providing 45 non-self contained units.</li> <li>100% of development on previously developed land.</li> <li>Meeting the affordable housing target of 50%.</li> <li>Achieving a 60:40 split of social rented and intermediate homes.</li> <li>50% of new homes to be 3 bed or larger.</li> <li>All new build to be built to lifetime home standards.</li> <li>10% of new developments with a capacity of 10 or more units to be wheelchair accessible or easily adaptable.</li> </ul>
			<ul style="list-style-type: none"> <li>Providing homes of differing sizes, types and tenures.</li> <li>Ensuring all new housing development are built to the highest level of build and design quality.</li> <li>Providing a variety of housing types to meet the identified needs of older and vulnerable communities.</li> <li>Meet the needs of Gypsies &amp; Travellers.</li> </ul>	H5 – (N1155) – New affordable housing target (gross). H6 – Housing quality – Buildings for Life L8 – Housing density L9 (i) & (ii) – Affordable housing by type and tenure. L2 - Housing built as part of mixed use. development. L10 – Housing development by unit type. L11 – Lifetime home and Wheelchair accessible units. L12 – Dwelling conversions. New indicator - Loss and gain of HMOs.
SO3	CS3 Making Efficient Use of Employment Land	<ul style="list-style-type: none"> <li>Enough land is protected to meet demand for industrial and warehousing uses</li> </ul>	BD1 – total amount of additional employment space by type. BD2 – total amount of employment floorspace on previously developed land by type.	Over the plan period: <ul style="list-style-type: none"> <li>No more than 24.5 hectares of B class land to be released from employment uses</li> </ul>
			<ul style="list-style-type: none"> <li>A growth in the level of employment provided in the borough, in particular within designated sites</li> <li>Increase in office space in designated centres and key growth areas</li> <li>Enhanced opportunities for small and medium enterprises and creative/ cultural industries</li> <li>Efficient use of surplus employment land for appropriate uses</li> </ul>	BD3 – Employment land available by type. L1 – Loss of employment land. L2 – Employment land lost to residential use. NI171 – New business registration rate

Strategic Objective	Core Strategy Policy	Desired Outcomes	Monitoring Indicators	Main Targets
SO4	CS4 Providing Infrastructure	<p>Increase in accessibility of social and physical infrastructure through the development of:</p> <ul style="list-style-type: none"> <li>• Accessible facilities in town centre locations.</li> <li>• Standard rates of provision for social and community facilities is maintained and exceeded.</li> <li>• Access to community and social infrastructure by walking and cycling is increased.</li> </ul> <p>Increase in water, energy and telecommunications provision regarding new development that create additional demand for infrastructure.</p> <p>The provision of green infrastructure is covered under Policy CS6.</p>	<p>L22 – floorspace for health services</p> <p>L20 – approvals for communities facilities (D1)</p> <p>NI9 - Use of public libraries</p> <p>NI3 - Civic participation in the local area</p> <p>L43 - Number of telecommunication base units approved</p> <p>New indicator - Number of pubs/bars</p>	<ul style="list-style-type: none"> <li>• Maintaining/increasing the capacity of existing facilities to meet the needs.</li> <li>• Increase in health and community use floorspace where possible.</li> <li>• Increase in use of public libraries.</li> <li>• Increase in civic participation in the Borough</li> </ul>
SO5	CS5 Minimising and Adapting to Climate Change	<ul style="list-style-type: none"> <li>• Reducing carbon emission from new development and existing building stock (policy CS5 A, B, C, D)</li> <li>• Supplying energy efficiently and securing the long term energy supply (policy CS5 E, F)</li> <li>• Managing and reducing flood risk and reducing reliance on potable water (policy CS5 G, H, I)</li> </ul>	<ul style="list-style-type: none"> <li>• Carbon Reduction Commitment (CRCEE scheme)"</li> <li>• Annual DECC Carbon Dioxide Emissions data set</li> <li>• New Indicator - Percentage of development that achieve the required carbon reduction targets set in the DMP DPD</li> <li>• E3 - Renewable energy capacity installed by type in Megawatts (MW)</li> </ul>	<ul style="list-style-type: none"> <li>• Reduction in per capita CO2 emissions of 80% by 2050 against a 2005 baseline with interim targets of 9%, 14% and 40% from local actions by 2012, 2015 and 2025 respectively (policy CS5 A, B, C, D, E, F)</li> <li>• Improved sustainability of new developments in relation to energy/carbon emissions, water, materials, surface water runoff, waste, pollution, health and well-being, management and ecology (policy CS5 B, I)</li> </ul>
SO6	CS6 Enhancing Green Infrastructure and Biodiversity	<ul style="list-style-type: none"> <li>• Only appropriate development and access on Green Belt and MOL (policy CS6 A)</li> <li>• Creation of new open spaces and better connectivity of the green infrastructure network (policy CS6 B)</li> <li>• Extension of Greenways, Green Corridors and landscaping along transport routes (policy CS6 C)</li> <li>• Improved quality and access to open spaces (policy CS6 D)</li> <li>• More efficient use of allotments and space to grow (policy CS6 E)</li> </ul>	<ul style="list-style-type: none"> <li>• New Indicator - Number of district heating schemes installed</li> <li>• New Indicator - No. of units connected to district heating schemes</li> <li>• New Indicator - Percentage of applications for new build that achieve at least CfSH level 4 or BREEAM 'very good' in accordance with targets in the DM DPD</li> <li>• New Indicator - Number of planning approvals for conversion or extensions over 100m<sup>2</sup> with retro-fit conditions imposed.</li> <li>• E1 - Planning applications for development on areas of flood risk; number refused, number permitted</li> </ul>	<ul style="list-style-type: none"> <li>• No increase in flood risk in the Borough through appropriate design and siting of development and sustainable urban drainage systems (policy CS5 G)</li> <li>• No development on areas of flood risk which would be contrary to the approach in PPS25 (policy CS5 H)</li> </ul>
		<ul style="list-style-type: none"> <li>• Lee Valley Regional Park and Epping Forest is protected and enhanced (policy CS6 F)</li> <li>• Waterways are safeguarded and improved in relation to ecology, access and quality (policy CS6 G)</li> <li>• Habitats and species are protected (policy CS6 H)</li> <li>• Increased area and number of priority habitats (policy CS6 I)</li> <li>• Better public access to nature (policy CS6 J)</li> <li>• Maintain the Local Nature Reserves (LNRs) and create new LNRs (policy CS6 K)</li> <li>• Existing healthy trees are protected and new trees planted (policy CS6 L)</li> <li>• Good quality and adequate provision of play and recreational spaces, outdoor sports facilities and parks (policy CS6 M)</li> </ul>	<ul style="list-style-type: none"> <li>• Local Indicator - Allotments</li> <li>• Local Indicator - E2 change in areas of biodiversity importance</li> <li>• Local Indicator - E2 change in areas of biodiversity importance</li> <li>• Local Indicator - Implementation of Waterway Projects</li> <li>• L30 - vulnerable species and safeguarded habitats</li> <li>• Local Indicator (previously NI197) - Improved local biodiversity- active management of local sites</li> <li>• Local Indicator -Access to nature</li> <li>• Local Indicator -Local Nature Reserves (LNR)</li> <li>• Local Indicator: Trees</li> <li>• Local Indicator -Provision for children and young people (e.g. Playgrounds)</li> </ul>	<ul style="list-style-type: none"> <li>• No net loss of allotments</li> <li>• Increase in space to grow</li> <li>• No negative change in areas of biodiversity importance</li> <li>• Reduction in percentage of 'unfavourable declining'</li> <li>• Delivery of the Lee Valley Pathway by 2026</li> <li>• Delivery of the Walthamstow Wetlands by 2017</li> <li>• Revitalisation of the Dagenham Brook by 2026</li> <li>• Reduction in species classed as vulnerable and continued protection of safeguarded habitats</li> <li>• Improved local biodiversity-Current Performance= 86%. 2010-2011= 88%. 2011-2012= 89. 2012-2013= N/A</li> <li>• Reduction in areas (ha) deficient in access to nature as shown on Figure 16</li> </ul>
Strategic Objective	Core Strategy Policy	Desired Outcomes	Monitoring Indicators	Main Targets

				<ul style="list-style-type: none"> <li>Local Indicator - Outdoor sports facilities</li> <li>NI8 – Adult participation in sport</li> <li>NI56 – Obesity in school children in year 6</li> <li>Local Indicator - Number of Council parks and open spaces which meet the Green Flag standard</li> </ul>	<ul style="list-style-type: none"> <li>No loss of LNRs</li> <li>Increase in number of LNRs</li> <li>Increase number of Tree Preservation Orders</li> <li>Increase space for children and young people</li> <li>Increase in outdoor sports facilities</li> <li>Increase in adults participating in sport- Current Performance= 17.7%. 2010-2011=23%. 2011-2012=25.4%. 2012-2013= N/A</li> <li>Reduction in childhood obesity</li> <li>Green Flag standard- Current Performance= 2. 2010-2011= 2. 2011-2012= 4. 2012-2013= 5</li> </ul>
SO7	CS7 Promoting Sustainable Waste Management and Recycling	<ul style="list-style-type: none"> <li>Reduced amount of residual household waste per head</li> <li>Reduced amount of waste sent to landfill and increased self sufficiency in management of municipal waste within the North London Boroughs</li> <li>Increased household waste recycled and composted</li> </ul>	<p>W1 – new waste facilities</p> <p>W2 – amount of waste by type</p> <p>L36 – household waste per head</p> <p>NI191 – residual household waste per head</p> <p>NI192 – household waste for recycling</p>	<ul style="list-style-type: none"> <li>Meeting the national recycling target of 45% by 2015, and 50% by 2020.</li> <li>Recycling and composting of at least 70% of commercial and industrial waste</li> <li>Recycling or reusing 95% of construction, excavation and demolition waste by 2020.</li> <li>Achieving at least 80% self-sufficiency by 2020 as part of the NLWP</li> </ul>	
		<ul style="list-style-type: none"> <li>Increased reuse of construction and demolition waste</li> <li>Increase in number of development approvals incorporating waste recycling facilities</li> </ul>	<p>NI193 – Waste land filled</p> <p>L37 – No. of recycling centre</p> <p>L38 – recycling facilities in new residential developments</p> <p>Indicators to be created and reported by the AMR of the NLWP.</p>		
SO8	CS8 Developing Sustainable Transport	<ul style="list-style-type: none"> <li>Accommodation of increasing travel demand due to regeneration and housing and employment growth in a sustainable manner (policy A,B,C,D,E,F,G,H,I,J)</li> <li>Improvement of the sustainable transport network to increase sustainable transport mode share (policy A,B,D,E,F)</li> <li>Minimisation and mitigation of negative impacts of traffic and traffic growth, including congestion, pollution and noise (policy D,G,H,I,J)</li> </ul>	<ul style="list-style-type: none"> <li>Improved access to services and facilities by public transport, walking and cycling</li> <li>The proportion of travel made by walking and cycling</li> <li>The proportion of travel made by public transport</li> <li>Excess wait time for all high-frequency bus services</li> <li>The total number of KSIs and the total number of casualties</li> <li>Tonnes of CO2 emanating from ground-based transport per year</li> <li>Delivery and implementation of travel plans and transport assessments</li> <li>Number of car club bays and membership</li> </ul>	<ul style="list-style-type: none"> <li>Proportion of walking increased to 34% in 2013/14 and to 37% by 2025/26 (policy C, D, E, G)</li> <li>Proportion of travel by cycling increased to 2% by 2014 and 6% by 2025 (policy C, D, E, G)</li> <li>Carbon dioxide emissions from ground based transport per year reduced from 164 kilo tonnes per year in 2008 to 96.82 Kilo tonnes CO2 emissions by 2026 (policy A,B,C,D,E,F,G,H,I,J)</li> <li>People killed and seriously injured from road traffic accidents reduced from 99 to 66 by 2020 (33% reduction from 2006-08 baseline) (policy G)</li> <li>Excess wait time (EWT) for high frequency bus services of 1.4</li> </ul>	
		<ul style="list-style-type: none"> <li>Reduced reliance on private motorised traffic (policy A,B,C,H,I)</li> <li>Improvement of quality of life for WF residents (policy A,B,C,D,E,F,G,H,I,J)</li> </ul>	<ul style="list-style-type: none"> <li>Number of electrical charging points</li> <li>Parking provision for new development in compliance with the parking standards</li> </ul>	<ul style="list-style-type: none"> <li>minutes in 2013/14 and 1.5 minutes in 2017/18 (policy D,F,G,I,J)</li> </ul>	
SO9	CS9 Promoting Better Education	<ul style="list-style-type: none"> <li>Sufficient school places provided</li> <li>Sustainably designed and accessible facilities</li> <li>Adequate play spaces and sporting facilities</li> <li>Redevelopment of schools as community hubs</li> <li>Provision of new educational facilities in identified areas of need.</li> </ul>	<ul style="list-style-type: none"> <li>School places each year compared to applications/ admissions per year (number/percentage)</li> <li>L20 New schools (including free schools) built</li> <li>N188 Number of extended schools</li> <li>Design Quality Indicators &amp; CAGE's 10 points for good school design standards</li> <li>BREEAM standards achieved on new school developments (number/ percentage)</li> <li>Proportion of schools operating as community hubs</li> </ul>	<ul style="list-style-type: none"> <li>100% match between demand and supply for school places</li> <li>Increase in the number/percentage of new schools meeting established design indicators and/or criteria (e.g. Design Quality Indicators &amp; CAGE's 10 points for good school design)</li> <li>Increase in percentage of new schools meeting BREEAM standards</li> <li>All schools to have dedicated play spaces/good access to play spaces for sports and recreation.</li> <li>Increase in area schools operating as community hubs</li> <li>Timely delivery of new schools in the area of need</li> </ul>	
			<ul style="list-style-type: none"> <li>Proportion of schools with dedicated play spaces/ good access to play spaces for sports/ recreation (percentage of schools)</li> <li>Sites designated or being redeveloped for new schools in areas of need (number/percentage).</li> </ul>		
SO10	CS10 Creating More Jobs and Reducing Worklessness	<ul style="list-style-type: none"> <li>Improved education and training facilities provided in the borough</li> <li>Improved qualifications, skills, and employment levels amongst residents of the borough, particularly within more deprived parts of the borough</li> <li>Disadvantaged sectors of the community are better able to physically access areas of employment</li> </ul>	<p>NI151 – Overall Employment rate (working age)</p> <p>NI152 – Working age people claiming out of work benefits</p> <p>NI153 – Working age people claiming out of work benefits in the worst performing neighbourhoods of the borough</p> <p>NI163 - Proportion of population aged 19-64 for males and 19-59 for females qualified to at least Level 2 or higher</p> <p>NI106 – Young people from low income backgrounds progressing to higher education</p> <p>NI117 - 16 to 18 year olds who are not in education, employment or training (NEET)</p>	<p>Over the plan period:</p> <ul style="list-style-type: none"> <li>Provision of 91sq m employment brokerage within the borough over the plan period.</li> <li>Reduction in the unemployment rate</li> <li>Reduction in percentage of residents claiming out of work benefits.</li> <li>Increase in proportion of working age population qualified to at least Level 2 or higher</li> <li>Reductions of 16 to 18 yr olds not in education, employment or training (NEET)</li> </ul>	

Strategic Objective	Core Strategy Policy	Desired Outcomes	Monitoring Indicators	Main Targets
SO11	CS11 Tourism Development and Visitors Attractions	<ul style="list-style-type: none"> <li>Obvious increase in number of visitors to WalthamForest.</li> <li>Increase in leisure developments in designated centres.</li> <li>Maintain high quality of natural habitats.</li> </ul>	<p>New Indicator - Number of bedrooms provided by new hotels</p> <p>D2 floorspace in designated centres</p> <p>Condition of SSSIs in the borough</p>	<p>Over the plan period:</p> <ul style="list-style-type: none"> <li>Net increase in number of hotel bedrooms.</li> <li>Net increase in D2 floorspace in designated centres</li> <li>No further decline in condition of SSSIs desired</li> </ul>
SO12	CS12 Protecting and Enhancing Heritage Assets	<ul style="list-style-type: none"> <li>Conservation areas, listed buildings, parks and gardens of local historic interest, archaeological priority zones protected</li> <li>New heritage designations identified,</li> <li>Conservation area appraisals and management plans prepared and implemented</li> <li>Heritage-led regeneration schemes identified and implemented</li> </ul>	<ul style="list-style-type: none"> <li>L34 – Approved planning applications/ enforcement cases relating to conservation areas/listed buildings.</li> <li>L35 – No. of conservation areas</li> <li>New Indicator - Heritage at Risk Register</li> <li>No. of conservation areas appraisal and management plans prepared.</li> <li>No. of heritage-led regeneration schemes taking place</li> </ul>	<ul style="list-style-type: none"> <li>No loss designated conservation areas.</li> <li>All designated conservation areas to have area appraisals and management plans.</li> <li>Removal of all assets from the Heritage at Risk Register</li> </ul>
SO13	CS13 Promoting Health and Fitness	<ul style="list-style-type: none"> <li>New development to meet appropriate Environmental Health Standards.</li> </ul>	<ul style="list-style-type: none"> <li>New Indicator - The annual mean NO2 level in the borough.</li> </ul>	<ul style="list-style-type: none"> <li>Decrease in the average mean level of NO2.</li> <li>Decrease in the average mean level of PM10.</li> </ul>
		<ul style="list-style-type: none"> <li>New development to contribute to improving health and reducing health inequalities</li> <li>Improvement to pedestrian and cycle access.</li> <li>Improved access to health, leisure and sports and recreation facilities.</li> <li>Improving the public realm to make in more attractive and safer.</li> <li>Reducing the proliferation of 'unhealthy' land uses</li> <li>Maximise the health benefits of the Olympic legacy.</li> </ul>	<ul style="list-style-type: none"> <li>New Indicator - The annual meanPM10 level in the borough.</li> <li>New Indicator - Decibel levels on the borough's main road and rail network and industrial locations</li> <li>L40 – The number and % of applications approved/refused as a result of unacceptable levels of air, water, noise, light pollution or loss of light.</li> <li>New Indicator - The number and % of major applications which submit a Health Impact Assessment.</li> <li>New Indicator - LIP Core Target 1a: Walking Mode Share.</li> <li>New Indicator - LIP Core Target 1b: Cycling Mode Share</li> <li>NI6 – Adult participation in sport.</li> <li>NI57 – Children and young people's participation in high-quality PE and sport</li> <li>NI195 - Improved street and environment cleanliness.</li> <li>New Indicator - Implementation of public realm improvement schemes.</li> </ul>	<ul style="list-style-type: none"> <li>Decrease in decibel levels on the borough's main road and rail network and industrial locations.</li> <li>100% of applications refused as a result of unacceptable levels of air, noise, water, light pollution or loss of light</li> <li>Increase in major applications which submit a Health Impact Assessment.</li> <li>36% walking mode share by 2025/26.</li> <li>6% cycling mode share by 2025/26.</li> <li>Increase in adult participation in sport</li> <li>Increase in youth participation in sport</li> <li>Improvement in street and environment cleanliness.</li> <li>Timely delivery of public realm improvement schemes</li> <li>Decreased obesity levels in children in year six.</li> <li>No increase in the number and % of Hot Food Take Away's in the borough.</li> <li>No increase in the number and % of Off licence/Betting Shops in the borough</li> <li>Improvement in life expectancy to meet the London wide average.</li> </ul>
			<ul style="list-style-type: none"> <li>NI56 – Obesity in school children in year 6.</li> <li>L19 – Number and % change of Hot Food Take Away's in the borough</li> <li>New Indicator - Number and % change of Off licence/Betting Shops</li> <li>New Indicator – Average life expectancy of borough residents.</li> </ul>	
SO14	CS14 Vibrant Town Centres	<ul style="list-style-type: none"> <li>New town centre uses located within the designated centres.</li> <li>Walthamstow town centres operating as a major centre with more dominant range/types of town centre uses.</li> <li>Improved range and type of town centre uses in other District and Neighbourhood centres</li> <li>Well established retail core areas in designated centres</li> <li>Balanced distribution of non retail uses and night time economy uses in individual centres</li> </ul>	<p>BD4 – new business space in town centre.</p> <p>L13 – development over 1000 sq m outside Town Centres.</p> <p>L14 - development over 1000 sq m in Town Centres.</p> <p>L15 – new residential development in town centres within 30 min of public transport.</p> <p>Percentage of households living with outside designated retail area.</p> <p>L17 – Uses/vacancy level in designated centres.</p>	<ul style="list-style-type: none"> <li>Growth in floorspace, footfall, shopping centre ranking, retail rents and yields.</li> <li>Increased percentage of new retail, leisure, office and other main town centre uses located in Walthamstow, the District and Neighbourhood centres and at out of centre locations.</li> <li>Primary shopping frontages of Walthamstow and District centres to maintain at least 70% ground floor retail frontage use.</li> <li>Secondary shopping frontages of Walthamstow and District centres to maintain at least 50% ground floor retail frontage use.</li> <li>Low vacancy levels within primary and secondary frontages.</li> </ul>
		<ul style="list-style-type: none"> <li>Well defined roles for individual centres</li> <li>New housing provision in town centres</li> <li>Underused sites and premises in designated centres re-developed</li> <li>Business Improved Districts established and operating in town centres</li> </ul>	<p>L18 – vacancy level in designated frontages.</p> <p>Percentage of retail/non retail uses in designated centres</p> <p>Town centre health checks - footfall/visitor satisfaction surveys</p> <p>No. of sites/town centre schemes implemented</p> <p>No. of Business Improvement Districts established and operating within designated centres.</p>	<ul style="list-style-type: none"> <li>Growth in new floorspace from redevelopment of vacant/underused sites</li> <li>Increased town centre performance/visitor satisfaction levels</li> </ul>

Strategic Objective	Core Strategy Policy	Desired Outcomes	Monitoring Indicators	Main Targets
SO15	CS15 Well designed building, places and spaces	<ul style="list-style-type: none"> <li>Improved standards of architecture and urban design.</li> <li>Publication of design advice/guidance</li> <li>Proposals for tall buildings directed to key sites/locations</li> <li>Improved provision of legible areas and spaces particularly in identified key growth areas</li> <li>Inclusive design measures incorporated in new design schemes</li> </ul>	<ul style="list-style-type: none"> <li>Number of schemes submitted/nominated for and/or awarded a design award</li> <li>Local area characterisation reviews undertaken</li> <li>Article 4 Directions and enhancement schemes implemented</li> <li>Number of pre-application discussions seeking advice from the Council</li> <li>Number of refusals on urban design grounds (and number of appeals dismissed)</li> <li>Number and location of tall buildings approved in key growth areas or identified sites (category 1 &amp; 2)</li> <li>Percentage of planning approvals (larger sites) incorporating creating new distinctive and legible areas/spaces</li> <li>Number of refusals on inclusive design standards grounds.</li> </ul>	<ul style="list-style-type: none"> <li>Increase in number/proportion of schemes nominated for a design award</li> <li>Increase in the number of local area improvement schemes implemented.</li> <li>No increase in Category 1 tall buildings in the borough generally</li> <li>Increase in number new public areas/spaces created through new schemes</li> <li>All new schemes to include to inclusive design standards</li> </ul>
SO16	CS16 Making Waltham Forest Safer	<ul style="list-style-type: none"> <li>Reduction in occurrence and fear of crime and antisocial behaviour in the borough</li> </ul>	NI15 – Serious and violent crime rate NI16 – Serious acquisitive crime rate NI20 Assault with injury crime rate  New indicator - % of residents who claim fear of crime has a significant impact on their quality of life	Over the plan period: <ul style="list-style-type: none"> <li>Decrease in total crime in Waltham Forest</li> <li>Reduction in incidents of anti-social behaviour in the borough</li> <li>Resident's Insight Survey showing a decrease in fear of crime levels</li> </ul>

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Appendix 3

**Delete and substitute;**

24.1 The policies contained in the Core Strategy will replace a number of policies in the adopted Waltham Forest Unitary Development Plan - First Review, March 2006. The following table is a guide showing how existing UDP policies are replaced under the LDF system. In this table, "Y" indicates a replacement of the existing UDP policy and "N" indicates no replacement. "E" indicates that the policy has expired and is deleted. In Columns 4, where information is shown as blank, no replacement policy is proposed through the Core Strategy. Similarly in Column 5, where information is shown as blank, no subsequent replacement LDF policy is proposed.

UDP Saved Policy	Policy Name	Is the UDP Policy superseded?	Replacement Core Strategy Policy	Forthcoming LDF Policy/Document <sup>(6)</sup>
Y= Yes, N= No E= Expired				
<b>Part 1</b>				
STRATEGIC POLICY SP1	The Environment	Y	CS2, CS5	
STRATEGIC POLICY SP2	Urban Design	Y	CS2	
STRATEGIC POLICY SP3	Transport Impact	Y	CS8	
STRATEGIC POLICY SP4	Integrated Transport	Y	CS8	
STRATEGIC POLICY SP5	Highway Schemes	Y	CS8	
STRATEGIC POLICY SP6	Public Transport, Cyclists and Pedestrians	Y	CS8	
STRATEGIC POLICY SP7	Retention of Employment Land	Y	CS3	
STRATEGIC POLICY SP8	New Employment or Mixed Use Developments	Y	CS3	
STRATEGIC POLICY SP9	Skilled Local Labour Force	Y	CS10	
STRATEGIC POLICY SP10	Shopping Centre Hierarchy	Y	CS14	
STRATEGIC POLICY SP11	Shopping Centres - Access, Convenience and Attractiveness	Y	CS14	
STRATEGIC POLICY SP12	Housing	Y	CS2	
STRATEGIC POLICY SP13	Residential Development - High Standards of Design	Y	CS2	
STRATEGIC POLICY SP14	General Community Facilities	Y	CS4	
STRATEGIC POLICY SP15	Leisure and Recreation Uses	Y	CS4, CS6, CS13	
STRATEGIC POLICY SP16	Planning for Equality	Y	CS16	
STRATEGIC POLICY SP17	Urban Regeneration	Y	CS1	
STRATEGIC POLICY SP18	Planning Obligations	Y	CS1	
STRATEGIC POLICY SP19	Monitoring and Review	Y	See Core Strategy (Section 21)	
<b>Part 2</b>				
<b>Economy Industry and Commerce</b>				
POLICY INB1	Strategic Employment Areas/Borough Employment Areas	Y	CS3	DM19, DM20
POLICY INB2	Local Employment Areas	Y	CS3	DM20
POLICY INB3	Non-zoned Employment Uses	Y	CS3	DM21
POLICY INB4	Environmental Improvements	Y	CS3	DM19, DM20, DM21
POLICY INB5	Improvement of Access at Sutherland Road	E		
POLICY INB6	Lee Valley Regeneration Corridor/Mixed Use Regeneration Areas	Y	CS1, CS3	DM1, DM20, DM21
POLICY INB7	Sites Not Currently in Employment Use	Y	CS3	DM21
POLICY INB8	Reuse of Redundant Offices	Y	CS3	DM21
POLICY INB9	Homeworking/Working from Home	N		DM21

<sup>6</sup> Emerging development plan document providing further on the Core Strategy Policy or replacing the UDP Policy

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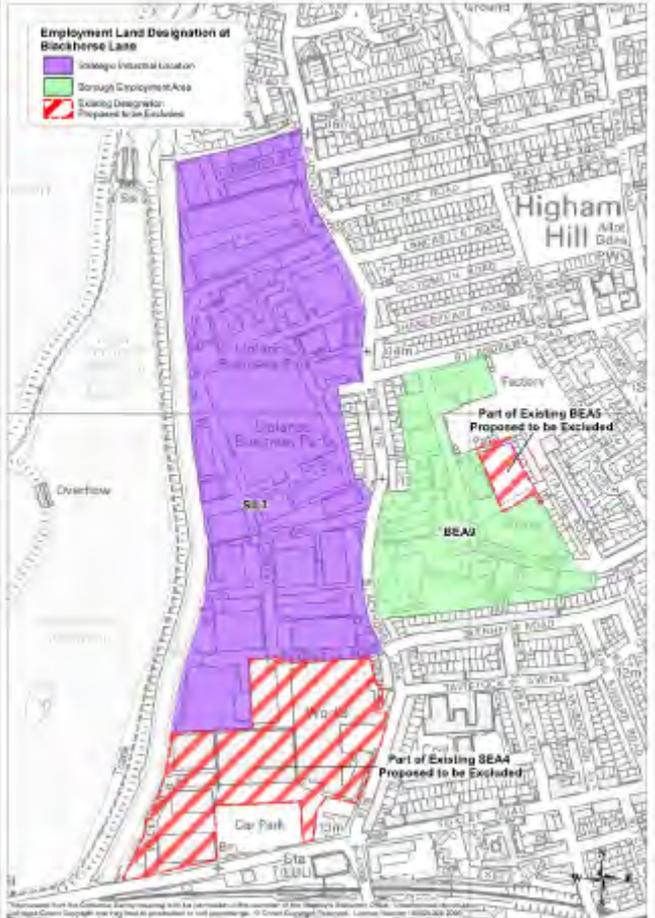
UDP Saved Policy	Policy Name	Is the UDP Policy superseded? Y= Yes, N= No E= Expired	Replacement Core Strategy Policy	Forthcoming LDF Policy/Document (6)
POLICY INB10	Live-work Units	N		DM21
POLICY INB11	Units for Small Businesses	Y	CS3	DM20, DM21
POLICY INB12	Railway Arches	Y	CS3	DM21
POLICY INB13	Training Needs	Y	CS10	DM22
POLICY INB14	Workplace Nurseries	Y	CS4	DM20
POLICY INB15	Development of Hotels	Y	CS11	DM23
<b>Housing</b>				
POLICY HSG1	New Developments on Identified Sites	E		See AAPs and Site Allocations Documents
POLICY HSG3	Proposals Involving a Loss of Residential Accommodation	Y	CS2	DM2
POLICY HSG4	Mixed Use Schemes - The Urban Renaissance	Y	CS2	DM1, DM7, DM8
POLICY HSG5	Redevelopment of Redundant or Underused Land and Buildings for Housing	Y	CS2	DM2
POLICY HSG6	Affordable Housing Target From All Sources	Y	CS2	DM3
POLICY HSG8	Housing Quality	Y	CS2, CS13	DM7, DM8
POLICY HSG9	Size of Units	Y	CS2	DM5, DM7, DM6
POLICY HSG10	Housing for Disabled People	Y	CS2	DM8
POLICY HSG11	Housing for People Requiring an Element of Care	Y	CS2	DM10
POLICY HSG13	Hostels and Other Temporary Accommodation	Y	CS2	DM10
<b>Town Centres Retailing and Leisure</b>				
POLICY TRL1	Hierarchy of Centres	Y	CS14	
POLICY TRL2	Development in Borough Centres	Y	CS14	DM23
POLICY TRL3	Out-of-Centre Developments	Y	CS1,CS14	DM27
POLICY TRL4	Regeneration of Town Centres	Y	CS14	DM27
POLICY TRL5	Primary Shopping Frontages	N		DM26
POLICY TRL6	Secondary Shopping Frontages	N		DM26
POLICY TRL7	Proposals Outside Primary and Secondary Frontages	N		DM26
POLICY TRL8	Neighbourhood Centres	N		DM26
POLICY TRL9	Local Retail Parades	N		DM26
POLICY TRL10	Proposals Outside Designated Centres and Retail Parades	N		DM26
POLICY TRL11	Safeguarding Amenity and Townscape Character	N		DM26
POLICY TRL12	Hot Food Takeaways, Restaurants and Night Economy Uses	N		DM24, DM26, DM28
POLICY TRL13	Housing in Designated Centres	Y	CS14, CS2	
POLICY TRL14	Retail Facilities in Petrol Filling Stations	Y	CS14	
POLICY TRL15	Facilities for Shoppers	Y	CS15	DM31
POLICY TRL16	Arts, Culture and Entertainment Facilities	Y	CS11	DM23
POLICY TRL17	Indoor Leisure and Recreation	Y	CS4	DM18
POLICY TRL18	Outdoor Markets	N		DM27
<b>General Community Services</b>				
POLICY GCS1	Provision of community sites and buildings	Y	CS4	DM18
POLICY GCS2	Retention of facilities and creation/ improvement of facilities as part of mixed use schemes	Y	CS4	DM18
POLICY GCS3	Provision of health care sites and buildings	Y	CS4,CS13	DM24
POLICY GCS4	Proposed alternative use of existing health care facilities	Y	CS13	DM24
POLICY GCS5	Provision of primary health care	Y	CS13	DM24
POLICY GCS6	Standards of accommodation in educational facilities	Y	CS9	DM18
POLICY GCS7	Provision of mobile classrooms	Y	CS4	DM18
POLICY GCS8	Re-use of redundant education sites/buildings	Y	CS4	DM18
POLICY GCS9	Liaison with public authorities and monitoring of land holdings	Y	CS4	
<b>Transport</b>				
POLICY TSP1	Public Transport - general	Y	CS8	DM14, DM15
POLICY TSP2	Buses	Y	CS8	DM14, DM15
POLICY TSP3	Safeguarding the Crossrail 2 Railway Line	Y	CS8	
POLICY TSP4	Pedestrians and Disabled People	Y	CS8	DM15
POLICY TSP5	Cycling	Y	CS8, CS13	DM15
POLICY TSP6	Access considerations	Y	CS8	
POLICY TSP7	Car Free/Reduced Car Owning Residential Developments	Y	CS8	DM17

6 Emerging development plan document providing further on the Core Strategy Policy or replacing the UDP Policy

UDP Saved Policy	Policy Name	Is the UDP Policy superseded? Y= Yes, N= No E= Expired	Replacement Core Strategy Policy	Forthcoming LDF Policy/Document (6)
POLICY TSP8	Town Centre Transport Policy	Y	CS8	DM14, DM15
POLICY TSP9	Developments with Significant Transport Implications	Y	CS8	DM14
POLICY TSP10	Minimising damage by Heavy Goods Vehicles	Y	CS8	DM14, DM16, DM17
POLICY TSP11	Criteria for assessing new road schemes or alterations	Y	CS8	DM15, DM16
POLICY TSP12	Orient Way	Y	CS8	DM14, DM15
POLICY TSP13	Environmental improvements relating to TLRN Roads	Y	CS8	DM14, DM15
POLICY TSP14	Main Road Network	Y	CS8	DM14, DM15, DM16
POLICY TSP15	Minor Roads	Y	CS8	DM14, DM15, DM16
POLICY TSP16	Traffic Management	Y	CS8	DM16
POLICY TSP17	Parking	Y	CS8	DM17
<b>Open Environment</b>				
POLICY ENV1	Urban Open Space	Y	CS6	DM13
POLICY ENV2	Boundary of the Green Belt	Y	CS6	
POLICY ENV3	Development in the Green Belt	Y	CS6	DM13
POLICY ENV4	Uses within Metropolitan Open Land	Y	CS6	DM13
POLICY ENV5	Development in Metropolitan Open Land	Y	CS6	DM13
POLICY ENV6	Protected Species/Biodiversity	Y	CS6	DM36
POLICY ENV7	Principal Sites of Nature Conservation Importance	Y	CS6	DM36
POLICY ENV8	Sites of Local Nature Conservation Importance (including Local Nature Reserves)	Y	CS6	DM36
POLICY ENV9	Brownfield sites of ecological importance	Y	CS6	DM36
POLICY ENV10	Facilities for visitors	Y	CS11	DM23
POLICY ENV11	Conservation of Green Corridors	Y	CS6, CS13	DM36
POLICY ENV12	New Green Corridors	Y	CS6, CS13	DM36
POLICY ENV13	Lee Valley Regional Park	Y	CS6, CS11, CS13	DM13, DM23
POLICY ENV14	Parks	Y	CS6, CS13	DM13
POLICY ENV15	Parks and Gardens of Local Historic Interest	Y	CS6, CS13	DM13
POLICY ENV16	New Open Spaces	Y	CS6, CS13	DM13
POLICY ENV17	Play Areas	Y	CS6, CS13	DM13
POLICY ENV18	Allotments	Y	CS6	DM13
POLICY ENV19	Walking	Y	CS6, CS13	DM13
POLICY ENV20	Playing Fields	Y	CS6, CS13	DM13
POLICY ENV21	Water-based recreation	Y	CS6, CS11	DM23, DM35, DM36
POLICY ENV22	Trees	Y	CS6	DM13
POLICY ENV23	Environmental Improvements to railway land	Y	CS3	DM21
<b>Built and Historic Environment</b>				
POLICY BHE1	Urban Design	Y	CS15	DM30
POLICY BHE2	Urban Design	Y	CS15	DM30
POLICY BHE3	Impact on Neighbouring Properties	Y	CS13	DM33
POLICY BHE4	Transport and Parking Implications	Y	CS8	DM16, DM17
POLICY BHE5	Access for All	Y	CS15	DM31
POLICY BHE6	High Buildings	Y	CS15	DM32
POLICY BHE7	Community Safety/Designing Out Crime	Y	CS16	DM34
POLICY BHE8	Advertisements	N		DM30
POLICY BHE9	Lighting and Light Pollution	Y	CS13	DM33
POLICY BHE10	Environmental Improvements	Y	CS15, CS16	
POLICY BHE11	Environmental Improvements	Y	CS15, CS16	
POLICY BHE12	Vacant Sites	Y	CS6	
POLICY BHE13	Conservation Areas	Y	CS12	DM29
POLICY BHE14	Statutorily Listed Buildings	Y	CS12	DM29
POLICY BHE15	Locally Listed Buildings	Y	CS12	DM29
POLICY BHE16	Other Buildings	Y	CS12	DM29
POLICY BHE17	Archaeological Heritage	Y	CS12	DM29
POLICY BHE18	Local Heritage	Y	CS12	DM29
<b>Waste, Pollution, Minerals, Water and Energy</b>				
POLICY WPM1	Waste Transfer Stations	Y	CS7	
POLICY WPM2	Waste Management Sites and Household Waste and Recycling Centres	Y	CS7	
POLICY WPM3	Re-provision of Household Waste and Recycling Centre	Y	CS7	
POLICY WPM4	Land for Waste Disposal	Y	CS7	

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			UDP Saved Policy	Policy Name	Is the UDP Policy superseded? Y= Yes, N= No E= Expired	Replacement Core Strategy Policy	Forthcoming LDF Policy/Document <sup>(6)</sup>			
			POLICY WPM5	Recycling	Y	CS7	DM33			
			POLICY WPM6	Development Causing Pollution	Y	CS13	DM25			
			POLICY WPM7	Development on Contaminated Land	Y	CS13	DM25			
			POLICY WPM8	Development involving Hazardous Products or Processes	Y	CS13	DM25			
			POLICY WPM9	Air Quality	Y	CS13	DM25			
			POLICY WPM10	Noise Pollution and Vibration	Y	CS13	DM25			
			POLICY WPM11	Light Pollution	Y	CS13	DM25			
			POLICY WPM12	Minerals	N		DM39			
			POLICY WPM13	Mineral Reserves	E					
			POLICY WPM14	Water Quality	Y	CS13	DM24			
			POLICY WPM15	Protection of Surface Waters	Y	CS5	DM35			
			POLICY WPM16	Works Affecting Watercourses	Y	WPM5, WPM6	DM35			
			POLICY WPM17	Water Supply - Demand Management	Y	WPM5, WPM6	DM35			
			POLICY WPM18	Flood Risk	Y	WPM5, WPM6	DM35			
			POLICY WPM19	Surface Water Run-Off	Y	WPM5	DM35			
			POLICY WPM20	Energy Efficiency	Y	WPM5	DM11			
			POLICY WPM21	Renewable Energy	Y	WPM5	DM12			
			<b>Planning Standards and Controls</b>							
			POLICY PSC1	General considerations	Y	CS2, CS15	DM8, DM34			
			POLICY PSC2	Amenity open space	Y	CS2, CS15	DM7			
			POLICY PSC3	Privacy and overlooking	Y	CS2, CS15	DM7, DM8 & DM30			
			POLICY PSC5	Extensions and alterations to dwellings	Y	CS2, CS15	DM4			
			POLICY PSC6	Shopfront design	Y	CS15	DM26			
			POLICY PSC7	Shopfront security	Y	CS16	DM34			
			POLICY PSC8	Street furniture	Y	CS15, CS16				
			POLICY PSC9	Telecommunications apparatus	Y	CS4	DM18			
			<small>6 Emerging development plan document providing further on the Core Strategy Policy or replacing the UDP Policy</small>							
198	199	Appendix 4	<i>Amend entry in row five; Waltham Forest Annual Monitoring Report 2008/2009 2009/2010</i>					M		
199	200	Appendix 4	<i>Amend entry in row five; Delete Draft</i>					M		
200	200	Appendix 4	<i>Amend entry in row six; Delete Draft</i>					M		
201	200	Appendix 4	<i>Amend entry in row eight; Delete Draft</i>					M		
202	200	Appendix 4	<i>Amend entry in row eighteen; Delete PMP, Substitute Neil Allen Associates; delete 2004, substitute 2011</i>					M		
203	203	Appendix 4	<i>Add; Sequential and Exceptions Test for the Core Strategy, LBWF, 2010; Level 2 Strategic Flood Risk Assessment for the Core Strategy, LBWF, 2011; Planning Policy statement 5 – planning for the Historic Environment; PPS5 Planning for the Historic Environment, Historic Environment Practice Guide (2010); Conservation Area Appraisals and Management Plans – LB Waltham Forest; Guidance on Tall Buildings – English Heritage/CABE, July 2007;</i>					M		

204	204	Appendix 5	<i>Amend entry for flood zones to refer to <u>figure 15</u> instead of <u>figure 28</u></i>	M
205	206	Appendix 5	<i>Amend entry for Mixed Use Regeneration Areas as follows; The following areas will be removed from the 2006 UDP Proposals Map: <u>MURA1</u>, MURA2, MURA3, MURA4 and MURA5. Part of the MURA5 will be designated as BEA22 with boundary as shown on Figure 36. No change proposed to <u>MURA1</u> and MURA6.</i>	M
206	207	Appendix 5	<i>Under heading <u>Community Services</u> insert; <u>Area of need for educational facilities</u>, - information shown on <u>figure 20</u> to be included on Proposals Map</i>	M
207	208	Appendix 5	<i>Add entries for <u>Habitat enhancement</u> and <u>Greenways</u>; Amendments to proposals map to accord with figures introduced in amendment 116</i>	S
208	210	Figure 28	<i>Delete</i>	S
209	213	Figure 31	<p><i>Delete and substitute;</i></p>  <p>The map displays the Employment Land Designation of Blackhorse Lane. It features a large purple area labeled 'Upland Business Park' and 'SE1'. To the east, there is a green area labeled 'BEAU' and 'Part of Existing BEAS Proposed to be Excluded'. Further south, there is a red and white striped area labeled 'Part of Existing SEAS Proposed to be Excluded' and 'Car Park'. The map also shows 'Higham Hill' and 'Factory'. A legend in the top left corner indicates: 'Employment Land Designation of Blackhorse Lane', 'Coloured Insets at Location', 'Borough Employment Area', and 'Existing Designation Proposed to be Excluded'.</p>	M
210	214	Figure 32	<i>Delete and substitute;</i>	M

211	215	Figure 33	<i>Revise to accord with figures 11 and 31</i>	M
212	216	Figure 34	<i>Revise to accord with figures 12 and 32</i>	M
213	221	Glossary	<u>Delete entry for affordable housing and substitute; Affordable housing includes social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market</u>	M
214	221	Glossary	<u>Insert entry for affordable rented housing; Rented housing let by registered providers of social housing to households who are eligible for social rented housing. Affordable rent is not subject to the national rent regime but is subject to other rent controls that require a rent of no more than 80 per cent of local market rents.</u>	M
215	226	Glossary	<u>Insert entry for Intermediate Affordable Housing; Housing at prices and rents above those of social rent, but below market price or rents.</u>	M
216	229	Glossary	<u>Insert entry for Social rented housing; Rented housing owned and managed by local authorities and registered social landlords, for which guideline targets rents are determined through the national rent regime.</u>	M